BIDWELLS

TRITAX PARK, CAMBRIDGE

REGULATION 18: DRAFT GREATER CAMBRIDGE LOCAL PLAN CONSULTATION REPRESENTATION

ON BEHALF OF TRITAX BIG BOX DEVELOPMENTS

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1.0 Introduction

1.1.1 These Regulation 18 Consultation representations (hereafter referred to as 'representations') are submitted on behalf of Tritax Big Box Developments (hereafter referred to as 'Tritax'). Tritax have an interest in land north of Bar Hill at Junction 25 of the A14, known hereafter as 'Tritax Park, Cambridge' and 'the Site'.

1.1.2 These representations should be read in conjunction with the following documents:

- Site Location Plan, prepared by AJA Architects (**Appendix 1**).
- Flood Risk Technical Note, prepared by Ridge + Partners (**Appendix 2**).
- Draft Landscape Masterplan (Reference: MLA104210-A3-0201_Rev A), prepared by Bidwells LLP (**Appendix 3**).
- Ecology Report, prepared by Applied Ecology (**Appendix 4**).
- Transport Technical Note, prepared by Ridge + Partners (**Appendix 5**).
- Need for B2/B8 in Greater Cambridge Note, prepared by Bidwells LLP (**Appendix 7**).
- Draft Market Report, prepared by Bidwells LLP (**Appendix 10**).
- Relevant Appeal Decisions referenced in these representations:
  - Land to the north of Cambridge North Station – PINS Refence: 3315611 (**Appendix 8**).
  - Beehive Centre, Coldhams Lane, Cambridge – PINS Reference: 3360616 (**Appendix 6**).
  - Land east of Halden's Parkway, Thrapston – PINS Reference: 3362393 (**Appendix 9**).
- Previous Call for Sites Information (Available on Request)

1.2 About Tritax Park, Cambridge

1.2.1 The land is identified at **Appendix 1** of these representations.

1.2.2 Tritax have entered into a Planning Performance Agreement (hereafter referred to as 'PPA', LPA Reference: PPA/25/0034) with Greater Cambridge Shared Planning Services to support pre-application discussions relating to land at Tritax Park, Cambridge. There has also been an Environmental Impact Assessment Scoping Opinion (hereafter referred to as 'EIA') submitted on the site (LPA Reference: 25/03990/SCOP) of up to 235,5000 sqm of Warehousing and Distribution space with ancillary use.

1.2.3 Tritax is a FTSE 250 company and the owner of the UK's largest logistics development and investment portfolio. As a long-term investor and developer, Tritax has a strong track record of delivering high-quality, sustainable logistics and employment developments and is supported by the financial capacity to bring forward development without reliance on external funding.

1.2.4 This is evidenced by Phase 1 of Tritax Park, Cambridge having a unit in Phase 1 which is pre-let to a leading occupier and will deliver a new parcel distribution facility for a nationally recognised delivery company. The early delivery of this phase demonstrates the Site's deliverability and its ability to support sustainable logistics operations within Greater Cambridge.

1.2.5 Tritax is bringing forward proposals for Tritax Park, Cambridge, a state-of-the-art logistics and advanced manufacturing park located to the north of Bar Hill, in close proximity to the A14 (Junction

25). The proposed development will provide essential infrastructure to support the efficient and reliable movement of goods, respond to evolving supply chain demands, and deliver significant economic benefits at a local and sub-regional level.

1.2.6 The scheme is underpinned by strong sustainability and ESG principles, including application of Net Zero Carbon principles, high-performance buildings, enhanced green and blue infrastructure, and meaningful community engagement. Tritax Park, Cambridge is intended to be a long-term, deliverable employment destination that supports economic growth, job creation and environmental stewardship, consistent with the strategic objectives of the emerging Local Plan.

1.3 The Context for Growth

1.3.1 The Government has reaffirmed its commitment to comprehensive planning reform, recognising that the current planning system has not delivered the scale of housing, infrastructure and economic development required to meet national needs. Central to this agenda is the Government's Plan for Change, which seeks to deliver 1.5 million new homes over the next 5 years alongside significant investment in nationally important infrastructure.

1.3.2 This commitment to growth is further reinforced by the UK Infrastructure: 10-Year Strategy and the UK's Modern Industrial Strategy, both of which emphasise the importance of long-term, coordinated investment in strategic infrastructure and employment locations to support productivity, economic resilience and national competitiveness. The Industrial Strategy rightly recognises the vital contribution of the freight and logistics sector to the UK economy and the competitiveness of the Government's identified focus sectors.

1.3.3 The Government has made clear that the planning system must operate as a proactive enabler of growth, rather than a constraint, in order to address the country's acute housing shortage and infrastructure deficit. Within this context, the logistics and industrial sector is recognised as nationally important infrastructure, essential to the efficient functioning of the modern economy and the delivery of sustainable growth. As housing delivery accelerates, there is increased pressure to ensure that sufficient employment land is available to support associated economic activity, logistics capacity and supply chain resilience.

1.3.4 Evidence published by Knight Frank 2025 ("Future Gazing: Industrial and Logistics for Europe's Future") highlights the evolving relationship between housing growth and industrial space demand. In the UK, industrial floorspace per household has increased over the past decade, from 9.5 sqm to 10.1 sqm, driven by urbanisation, changing lifestyles and the growth of online retail. This trend is expected to continue, reinforcing the need for an adequate supply of well-located logistics and industrial land to support future growth.

1.3.5 The National Planning Policy Framework, 2024, (hereafter referred to as 'NPPF 2024') requires Local Plans to meet identified employment land needs in full. Paragraphs 85–87 emphasise the importance of creating the conditions in which businesses can invest, expand and adapt, with specific recognition of the logistics and industrial sectors as vital components of the national economy.

1.3.6 Further, the direction of travel set out in the reformed version of the NPPF consultation draft (hereafter referred to as 'NPPF 2026') is unequivocal – "*Economic growth is the number one mission of this Government".* The proposed revisions seek to strengthen national policy support for economic growth and productivity, placing increased emphasis on the role of employment development in delivering wider economic benefits. The consultation draft includes Policy E3, specific to freight and logistics, which recognises the strategic importance of the sector in enabling

the efficient movement of goods. The policy acknowledges long-standing challenges, including the need for sites in appropriate locations with access to suitable transport connectivity. It is clear that planning for minimum levels of employment growth and not responding to clear market signals will no longer be accepted in Plan-making. In contrast, Greater Cambridge should be looking to catch up and or match levels achieved across the wider sub region of the Cambridge to Oxford Arc, which as highlighted in our appended economic needs analysis (Paragraph 16) highlights a historic negative suppression of B2/B8 across Greater Cambridge resulting in a notable difference in economic output.

2.0 HELAA Analysis

2.1 Introduction

2.1.1 Bidwells LLP have reviewed the Housing and Economic Land Availability Assessment (hereafter referred to as 'HELAA') prepared as part of the evidence base of the Local Plan.

2.1.2 Tritax Park, Cambridge (Land north of the A14, Bar Hill) has been assessed under HELAA Site ID 40121 and 40244, denoted in **Figure 1** by a Red Star. These Sites differ through the red lines that have been promoted. HELAA Site ID 40121 (hereafter referred to as "Whole Site") refers to the whole parcel which has been promoted under the PPA undertaken with the Council, and since Tritax's involvement. HELAA Site ID 40244 (hereafter referred to as "Partial Site") refers to just the land promoted which is owned by Glebe College but as mentioned above, this also forms part of the Whole Site.

2.1.3 For the avoidance of doubt, the Site is now being promoted as the Whole Site, thus any representations will be made with respect to this.

2.1.4 The Council have outlined their preferred options within this Regulation 18 Consultation, with 3 of these being in close proximity to Tritax Park, Cambridge. Land at Junction 25 of the A14, Bar Hill (hereafter referred to as "Slate Hall Farm"), Buckingway Business Park and Land to the south of Cambridge Services, A14 have been included as the preferred options for logistics development along the A14.

2.1.5 Slate Hall Farm has been assessed under HELAA Site ID 40248. This is shown by a Blue Star in **Figure 1**. Buckingway Business Park has been assessed under HELAA Site ID 40455 and shown by a Yellow Star. Land to the south of Cambridge Services, A14 has been assessed under HELAA Site ID 115132 and shown by Green Star.

Figure 1: Extract of Google Map image showing relevant Sites (Source: Google Earth Pro)

2.2 Flood Risk

2.2.1 Tritax Park, Cambridge has been categorised as Red in terms of Flood Risk. As part of the previous Call for Sites, a Flood Risk and Modelling Technical Note (4 Parts) was prepared and submitted which contained flooding information on the Site. As part of these representations, Ridge and Partners LLP (hereafter referred to as 'Ridge') have prepared a supporting Technical Note (**Appendix 2**) which outlines an update to the previous position, as a result of updates in 2025 (March and August) to the Flood Maps.

2.2.2 Any on-site flooding will be limited to in channel flooding and would not impact the wider Site or any of the surrounding areas (including downstream). Any development will be proposed outside the areas of highest risk of flooding (Flood Zones 2 and 3). Access will be provided through 600mm of freeboard above the top of bank and supporting embankments, all located outside of the Flood Zones.

2.2.3 Slate Hall Farm is likely going to have to provide access through an area of flooding, that is not in channel, thus being a worse scenario than that of Tritax Park. The publicly available mapping outlines that Slate Hall Farm is roughly 2 times more likely to be at risk of fluvial flooding, and 8 – 100 times more at risk of groundwater flooding. Thus, questioning the appropriateness of this being classified as Amber on Flood Risk, as opposed to Tritax Park, Cambridge.

2.2.4 Furthermore, dialogue between Ridge and the Environment Agency has outlined that they do not consider that a pre-application is required due to the low risk of flooding on-site. The Environment Agency do not consider that flood modelling is required due to development being located outside the flood zone areas.

2.2.5 Furthermore, there is an inconsistency in how Tritax Park, Cambridge has been assessed in regard to Flood Risk as opposed to Slate Hall Farm. Slate Hall Farm has not been scored via the somewhat arbitrary method in which Tritax Park, Cambridge has been scored. Instead, this has been qualitatively assessed based on a site assessment carried out by MJM Consulting Engineers. The Flood Risk and Modelling Technical Note prepared for Tritax Park, Cambridge, as part of the previous Call for Sites, should have been taken into consideration for this scoring.

2.2.6 Notwithstanding that the previously submitted technical information needs consideration, the updating of these flood maps should have triggered the RAG classification within the HELAA to be updated, in any event.

2.2.7 With regards to the HELAA scoring, Tritax Park, Cambridge should be upgraded to Green.

2.3 Landscape

2.3.1 Whilst Slate Hall Farm is not located in the Green Belt, it is considered to be within the setting of the Green Belt given its immediate proximity. The Green Belt boundary of Cambridge runs up Dry Drayton Road to the east, therefore, any proposals need to respect this setting within the landscape strategy and development massing. It should be noted that there is no reference in the Councils HELAA comments on the site's proximity to the Green Belt, which makes this an inaccurate depiction.

2.3.2 Tritax Park, Cambridge is removed from the Green Belt by the Slate Hall Farm site and the B1050. The Site does, therefore, not need to be viewed in the context of the Green Belt.

2.3.3 In terms of landscaping, it is acknowledged that the Site at Slate Hall Farm is less exposed than Tritax Park, Cambridge. However, the opportunities which exist in terms of landscaping mitigation

and benefits at Tritax Park, Cambridge vastly outweigh this. During the PPA discussions, Tritax have committed to delivering a minimum of 40% of the Site as green space (alongside 25% net gain in biodiversity), which can be comfortably accommodated on site, alongside the development proposals. This includes strategic landscaping along the northern and southern boundaries, with the westernmost parcel of the Site being delivered as a 'Country Park' which will provide significant benefits to the local community and future employees. This is shown in the draft Landscape Masterplan (**Reference: MLA104210-A3-0201_Rev A**, **Appendix 3**). Furthermore, this was discussed in the Landscape Technical Note submitted as part of the previous Call for Sites.

2.3.4 Furthermore, on the Slate Hall Farm site, it should be noted that there are 2 Public Bridleways that run through this site, with these intersecting in the western part of the development. These Bridleways and the views from these will be impacted as a result of this development, as any proposed development will have a direct impact on these routes and the associated views. On the other hand, Tritax Park, Cambridge does not have an immediate impact on any Public Rights of Ways/Bridleways albeit there are some views from both the Public Bridleways to the east and west. The proposed landscaping will offer mitigation to these routes.

2.3.5 Further work on ascertaining the most sensitive receptors and the potential impact of these is being undertaken, in liaison with the Landscape Officer, as part of the ongoing PPA. A Landscape and Visual Impact Assessment is being prepared and will be submitted in due course.

2.3.6 The HELAA scoring for Tritax Park, Cambridge should take into consideration the submitted documentation including the landscape masterplan which shows how the strategic landscaping can be accommodated on-site, providing screening from the surrounding area.

2.4 Biodiversity/Geodiversity

2.4.1 As part of the PPA process, an Ecology Report (prepared by Applied Ecology) was submitted. This report evidenced the surveys that had been undertaken thus far and detailing the on-site habitats. This has been submitted in **Appendix 4.**

2.4.2 The development provides a good opportunity to enhance local biodiversity by the conversion of existing low ecological value arable land to higher value habitats - most notably dry and wet grassland, native scrub, individual trees and wetlands including lakes, ponds and scrapes.

2.4.3 The development may also enable existing habitats to be enhanced to meet biodiversity objectives with a minimum of 25% net gain across the whole site. Improvements will occur for example at field drainage ditches and hedgerows.

2.4.4 Target faunal species known to occur in the local area which may benefit from habitat creation, enhancement and ecological management include a range of bird species including skylarks, lapwing, kingfisher, kestrel, and barn owl, plus water vole and a range of aquatic macroinvertebrates including dragonflies and damselflies.

2.4.5 During the PPA discussions, the ecologist was encouraged by the proposals and the mitigation which is to be proposed as part of the proposals. Thus, the scoring should be upgraded to Green.

2.5 Archaeology

2.5.1 Tritax Park, Cambridge has been assessed as Red in terms of Archaeology, as opposed to Slate Hall Farm being assessed as Amber. There is no commentary outlined in the HELAA document as to the reasoning to this. Both sites sit adjacent to the A14 which is known to have found some substantial archaeological finds throughout the improvement works.

2.5.2 In terms of Tritax Park, Cambridge, works are being undertaken as part of the PPA process to understand the extent of any archaeological remains, with conversations also underway with Cambridgeshire County Council Archaeology.

2.5.3 However, it should be noted that any archaeological remains will be damaged annually by the on-site ploughing. Given the size of Tritax Park, Cambridge, there will be opportunities for not only preservation in situ, in line with local and national planning policy, but also for significant public benefit and enhancement through education and interpretation. Not only can mitigation be satisfactorily embedded into the development, but the preservation of archaeology in a sustainable and educational manner more than offsets the loss of any potentially locally important archaeology that would be excavated and recorded before development commences.

2.5.4 The reflective HELAA score should, therefore, be amended to Green.

2.6 Accessibility / Site Access / Transport and Roads

2.6.1 Ridge have prepared a supporting Technical Note on the above matters (**Appendix 5**) which supports the below and an amendment in the HELAA score. These criteria have been combined in these representations and the supporting Technical Note due to the interlinking nature of the subject(s).

Accessibility / Transport and Roads

2.6.2 In terms of accessibility, the HELAA outlines that Tritax Park, Cambridge has "*inadequate accessibility to key local services, transport, and employment opportunities.*"

2.6.3 As outlined above, the proposed scheme is an employment scheme thus it is unclear how there is inadequate accessibility to employment opportunities. The scheme is proposing up to 235,500 sqm of employment floorspace which will generate a significant number of jobs and opportunities for the local people. This remark is, therefore, questioned.

2.6.4 Travel infrastructure is something that can be delivered at Tritax Park, Cambridge, with a number of different methods proposed including additional bus links, rerouting of the existing bus services, that run along the Site's frontage, into the site and cycling infrastructure.

2.6.5 The development will utilise the committed segregated walking and cycling facilities along the site frontage, delivered through the Northstowe new town development, providing sustainable direct links into Northstowe. There is noted to be an area to the north which has not been delivered as programmed. Tritax are engaging in further discussions with Cambridgeshire County Council Highways and the Local Authority on this.

2.6.6 The HELAA notes how additional capacity, required for developments, cannot be easily implemented with there being a reliance on active travel infrastructure of which there is not appropriate infrastructure. As outlined above, the existing and committed infrastructure runs directly past the site frontage and the proposed site access, thus meaning less investment will be required to accommodate and deliver Tritax Park, Cambridge. Accordingly, this emphasises that delivery of the site can be accommodated within the existing infrastructure/subject to modest investment and upgrade.

2.6.7 In addition to the links that will be provided to Northstowe, Tritax Park, Cambridge is also in close proximity to Bar Hill and the facilities that are offered here, including a supermarket which is located circa 1.3km south of the Site Access. Using the public transport network, including existing paths, users of the site will be able to easily access these facilities.

2.6.8 There are also opportunities for Tritax Park, Cambridge to link into the existing public bridleway which has been identified to the west of the Site. This can be enhanced to support and improve pedestrian/cycle connections from the west. This could also then be linked to the existing connections located along the B1050 on the site access.

Site Access

2.6.9 Tritax Park, Cambridge is ideally placed to utilise both the Strategic Road Network and the A1307 system (specifically engineered to segregate local traffic from strategic HGV flow). This ensures there is flexibility and higher capacity compared to constrained, village-linked routes. HGV's associated with the development at Tritax Park, Cambridge will use the A14 for access, with this limiting the traffic on the A1307, which is a 'local' road.

2.6.10 The access point to the proposed development is to be taken off the B1050 to the east, with this being an immediate approach from the A14 interchange, which is considered to be the most efficient approach.

2.6.11 As opposed to the Slate Hall Farm scheme which has a much more convoluted access strategy due to access being required from either the A1307 or Dry Drayton Road. Any HGV's which enter the site will need to travel through 2 sets of traffic lights, with minimal dedicated turning lanes as part of their primary routing, thus providing a tight routing to the site access.

2.6.12 The available access routes for Slate Hall Farm are more heavily influenced by the residential environments of Dry Drayton and Oakington, thus being less suited for high volume employment led traffic, including HGV's, having increased journey time and causing more conflicts with the local road network.

2.6.13 Furthermore, the proposed allocation at Buckingway Business Park, was considered in the HELAA as rated Red, due to the site not having access to the public highway. It is unclear how this will interact with the existing Business Park, and the surrounding active transport network which includes the Public Bridleway.

Conclusion

2.6.14 Ultimately, when constructed, Tritax Park, Cambridge will have direct bus links and alignment with the Local Cycle and Walking Infrastructure Plan whilst also providing an access that will not cause a detrimental impact on the surrounding road network.

2.6.15 The HELAA scores attributed to Accessibility and Transport and Roads should therefore be amended to Green.

2.7 Available?

2.7.1 The Site has been considered as Amber for available for the Whole Site, however, the Partial Site has been assessed as available. It is unclear as to what the difference between the 2 parcels given that the commentary is the same.

2.7.2 This Site is being promoted by Tritax who have a track record of delivering similar schemes across the Country including in Oxfordshire. There are no concerns over the land ownership, with both landowners committed to the delivery of the proposed scheme.

2.7.3 Since the Call for Sites submission in March 2025, Tritax Park, Cambridge has been subject to a PPA/EIA Scoping with the Council, as outlined in Paragraph 1.2.2. This has included 5 workshops

with the Council and attendance at Members Briefing thus far, with further meetings expected in 2026. Tritax are committed to delivering this scheme and submitting a planning application in 2026.

2.7.4 Furthermore, Tritax have already pre-let part of Phase 1 to a nationally recognised parcel delivery operator which demonstrates the deliverability and availability of the scheme.

2.7.5 Therefore, the availability of the Whole Site should be changed to Green.

2.8 Conclusion

2.8.1 As per the above, it is perceived that there should be some amendments to the HELAA summary for Tritax Park, Cambridge, as provided as part of this consultation. For the avoidance of doubt, we have prepared an updated table, below (**Table 1**).

Table 1: Updated HELAA Summary

	LPA HELAA SCORE – SLATE HALL FARM	LPA HELAA SCORE – TRITAX PARK, CAMBRIDGE	SUGGESTED REVISED HELAA SCORE – TRITAX PARK, CAMBRIDGE
Adopted Plan Position			
Flood Risk			
Landscape			
Biodiversity and Geodiversity			
Policy Position			
Historic Environment			
Archaeology			
Accessibility			
Site Access			
Transport and Roads			
Noise, Vibration, Odour and Light			
AQMA			
Contaminated Land			

Overall Suitability Score			
Available RAG			
Achievable RAG			

2.8.2 **Table 1** highlights the suitability of Tritax Park, Cambridge compared to the proposed allocation in the Regulation 18 consultation at Slate Hall Farm with Tritax Park, Cambridge scoring better in comparison to this site which has clear barriers to delivery (as discussed within these representations but specifically **Section 3.6**).

2.8.3 The Council should, therefore, revisit their analysis and their allocation of Slate Hall Farm in the consultation, as part of their requirement to consider all reasonable alternatives and additional need requirements.

3.0 Representations

3.1 Policy S/JH: New Jobs and Homes

3.1.1 Tritax object to the proposed wording of Policy S/JH.

3.1.2 The proposed policy wording presents the job figure as an objectively assessed need, however, the figure must be treated as a minimum benchmark rather than a maximum or constraining target.

3.1.3 The Emerging Local Plan identifies the need for 73,300 additional jobs between 2024 and 2045 to support Greater Cambridge's knowledge-intensive economy and provide a diverse range of local employment opportunities. This is considered as the 'central growth' scenario, without accounting for the full objectively assessed need, for reasons set out below.

3.1.4 The policy's supporting evidence base titled the 'Greater Cambridge Employment and Housing Needs Update 2024-2045' (September 2025), prepared by Iceni, concludes in Section 3.55 that the various scenarios modelled indicate a need of between 67,600 and 90,900 additional jobs over the plan period.

3.1.5 This range compares to between 66,600 and 75,800 additional jobs modelled under the previous 2023 results. This significant increase in the upper end of the modelling indicates that economic growth expectations have strengthened exponentially, not diminished.

3.1.6 As set out in the abovementioned Iceni Employment and Housing Needs Update, during the strongest phase of growth (2010–2020), the Greater Cambridge economy expanded by almost 4,000 jobs per year. The evidence identifies a 'central growth' scenario of 73,200 jobs across the plan period, representing sustained annual growth of around 3,500 jobs.

3.1.7 Crucially, this scenario already builds in assumptions of slower periods, contractions, and economic shocks, and is therefore inherently conservative rather than reflective of the full growth capacity of the Cambridge economy.

3.1.8 On 23rd August 2024, Matthew Pennycook reaffirmed the Government's commitment to Cambridge stating; "*The economic growth of Cambridge has been a phenomenal success and we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy." Pennycook goes on to say; "Greater Cambridge has a vital role to play in this* Government's mission to kickstart economic growth."

3.1.9 More recently, on 29th January 2025, Rt Hon Rachel Reeves (Chancellor of the Exchequer) 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 in respect of 'kickstarting economic growth'. This was referenced in the recent Call in Appeal Decision for the Beehive redevelopment (PINS Reference: 3360616, **Appendix 6**).

3.1.10 As set out in the accompanying 'Need for B2/B8 in Greater Cambridge' note prepared by Bidwells (January 2026, **Appendix 7),** this highlights the market suppression that already exists in Cambridge. Paragraph 16 of the note states; '*By 2024, Oxford Economics local forecasts (April 2025) showed that only 9.7% to of the total GVA generated by Greater Cambridge was from the Manufacturing and Transport and Storage sectors1 ("the B2/B8 sectors"), compared to 14.7% for the entire Cambridge to Oxford Arc. Clearly there has been an intentional suppression of these industrial sectors in Greater Cambridge through planning policy since at least the 1990s and is now*

manifesting itself through a notable difference in economic output." The emerging Local Plan must allow the market to respond accordingly and meet national and local planning objectives.

3.1.11 The Government's commitment to growth in Cambridge, and specifically economic growth has been further strengthened through the direction of travel set out in the proposed reform version of the NPPF 2026. Policy E2 affords; '*substantial weight should be given by the decision-maker to the economic benefits of proposals for commercial development'.*

3.1.12 The Iceni Report acknowledges a 'High' and 'High Sensitivity' scenario, whereby growth would meet or exceed the 2010–2020 trajectory. This level of growth is feasible in Cambridge and would support the Government's direction of travel from a national perspective. Recent comparative analysis of employment projections, including the Homes England study (2023), the Emerging Local Plan, and the Oxford Economics forecast (October 2025), indicates the proposed Local Plan assumptions remain relatively cautious at 1.3% per annum over the period 2024–2045.

3.1.13 These projected growth rates are no higher than those recorded between 2019 and 2024, a period which includes the impacts of the Covid-19 pandemic. By contrast, post-pandemic employment growth between 2021 and 2024 has exceeded forecast projections. Evidence demonstrates that higher-growth outcomes remain credible and should not be ruled out by policy, as is currently the case with the proposed policy wording.

3.1.14 The commitment to growth is evident in the recent Secretary of State Call in for the Beehive redevelopment. The Appeal Decision makes clear that the Secretary of State recognised "*benefits in terms of employment and social value arising from employment should be given significant weight*" and that "*benefits relating to the proposal's support for economic growth and productivity in the Greater Cambridge area should be given significant weight*".

3.1.15 Importantly, this reinforces the principle that economic growth plays a critical role in maintaining a fluid and competitive employment land market at a strategic scale, ensuring that sufficient choice, flexibility and quality of provision are available to support business expansion, inward investment and productivity gains across the wider area. This was further echoed in the Call in Appeal Decision for the redevelopment of Cambridge North (PINS Reference: 3315611, **Appendix 8**) which states; "*The Inspector states that great weight should be assigned to economic benefits. In accordance with paragraph 85 of the Framework, the Secretary of State assigns significant weight to economic growth and productivity benefits, and driving innovation."*

3.1.16 The justification for the 73,300 figure rests on a 'central' forecast which assumes robust growth but explicitly accounts for downturns and unknown shocks. By definition, this embeds caution and therefore should not be treated as a cap on growth. The evidence base itself recommends flexibility in employment land provision to accommodate potential out-performance of the central scenario.

3.1.17 Furthermore, the Local Plan's employment evidence identifies requirements for over 300,000 sqm of office and R&D space and over 317,000 sqm of industrial and warehousing floorspace, signalling substantial and growing demand across sectors - notably logistics, manufacturing, and support services.

3.1.18 Treating 73,300 jobs as a ceiling, risks misaligning land allocations, constraining business expansion, and undermining the Plan's ability to respond to economic change. Chapter 6 (Building a strong, competitive economy) of the NPPF 2024 states at Paragraph 86 (e); planning policies should "*be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."* The commitment to economic growth is further strengthened in the direction of

travel set out in the NPPF 2026 which states at Chapter 7 (Building a strong, effective economy); "*Economic growth is the number one mission of this Government*."

3.1.19 As set out and reaffirmed at Section 7.92 of the Cambridge North Appeal Decision, "*The Council is a pro-growth, pro-business authority which actively seeks to assess development needs and plan for them where it is sustainable to do so*." This stance is supported by the adopted Local Plan, which does not impose a cap on job numbers. By contrast, the introduction of a cap on job numbers in the Emerging Local Plan runs counter to the Council's stated pro-growth agenda and represents a regression from the adopted policy position.

3.1.20 For these reasons, the Local Plan should:

- Consider utilising a more optimistic and realistic figure for job numbers.
- Confirm that 73,300 jobs is a baseline minimum, not a maximum. Critical in supporting flexibility and changes in the market, as required under the NPPF 2024 and strengthened in the NPPF 2026.
- Include explicit support for higher-growth scenarios, with corresponding flexibility in employment land allocations.

3.1.21 The Bidwells B2/B8 Needs note suggests at Paragraph 28 a need for **424,900 sqm net additional** B2/B8 floorspace; "*we consider the adjustment in GVA to reflect sufficient flexibility if the figure is considered a minimum in accordance with the NPPF*". This figure is above the 317,000 sqm citied in the Iceni Report 2025. Furthermore (Paragraph 3), it highlights the need to engage with industry developers and agents in accordance with the National Planning Practice Guidance (Para 2a-026-20190220), in particular logistics developers and occupiers in order to fully understand the changing nature and requirements in relation to size, type and location of facilities, particularly the emergence of new technologies (PPG Para 2a-031-20190722).

3.1.22 Without these changes set out above, Policy S/JH risks being unsound and inconsistent with current national policy objectives to support sustainable economic growth and productivity. The NPPF 2024, Paragraph 87 states; "*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: a) clusters or networks of knowledge and data-driven, creative or high technology industries."* Furthermore, by using an objectively assessed figure, the current policy wording is contrary to the Governments number one mission of economic growth, cited in Chapter 7 of the NPPF (2026).

3.2 Policy S/DS: Development Strategy

3.2.1 Tritax object to the proposed wording of Policy S/DS.

3.2.2 Policy S/DS, as currently drafted and supported by its evidence base, places over-reliance on a limited number of large strategic sites to deliver both housing and employment growth.

3.2.3 This approach introduces significant delivery risk and uncertainty, particularly for industrial and logistics development, and risks undermining the Plan's ability to respond effectively to nationally significant growth pressures in Greater Cambridge.

3.2.4 Policy S/DS directs the majority of growth to strategic sites and existing urban areas. It relies heavily on complex, long-term allocations coming forward as anticipated. Experience demonstrates that such sites are often subject to delays arising from land ownership fragmentation, infrastructure funding, viability constraints and changing market conditions. This creates a particular risk for

employment land delivery, where industrial and logistics uses typically have lower value than offices, laboratories or residential development.

3.2.5 The Government has repeatedly reaffirmed the national importance of Greater Cambridge as a driver of economic growth, innovation and productivity, including explicit support for the Oxford-Cambridge Growth Corridor. These ambitions require not only laboratory and office space, but also a full spectrum of supporting industrial, logistics, manufacturing and distribution uses. The 'UK's Modern Industrial Strategy', published by the Government in November 2025, confirms their commitment to Cambridge as they seek to *"unleash the economic potential of Life Sciences Clusters"*, including Cambridge. The Strategy also provides confirmation of the Government's intentions specifically for freight and logistics and states they will be; *"working closely with industry, we will deliver a new plan for freight and logistics later this year so that the sector can continue to play its part in growing the economy"*. Recognition of the Industrial sector is strengthened in the NPPF 2026 which includes a specific policy for freight and logistics (Policy E3). Furthermore, Policy E2 also explicitly references freight and logistics in supporting economic development which is to be awarded substantial weight in the planning balance.

3.2.6 The Local Plan's own employment evidence identifies structural shortages and delivery uncertainty even for high-value employment uses. Where the supply of laboratory and office floorspace is acknowledged to be constrained and uncertain, this highlights a wider issue: the employment land pipeline as a whole lacks resilience.

3.2.7 If the Local Plan does not provide sufficient spatial flexibility beyond strategic sites, industrial and logistics uses are likely to be further marginalised.

3.2.8 Policy S/DS is not fully effective because it relies on a narrow spatial strategy that lacks contingency should strategic sites fail to deliver employment land at the anticipated pace or scale. This is particularly problematic for industrial and logistics uses, which require a responsive and diversified land supply.

3.2.9 The policy is insufficiently justified in assuming that strategic sites alone can meet the full range of employment needs over the plan period. The supporting evidence demonstrates uncertainty and delivery risk, yet the policy does not translate this into a more flexible spatial strategy.

3.2.10 To ensure Policy S/DS is effective, justified and resilient, it should be modified to:

- reduce reliance on a limited number of strategic sites for employment delivery;
- explicitly recognise the need for flexible and responsive provision of industrial and logistics land, including opportunities beyond strategic allocations; and
- ensure the spatial strategy supports the full range of employment uses required to sustain nationally significant growth ambitions.

3.2.11 Without these changes, Policy S/DS risks constraining industrial and logistics development, undermining supply chains, and limiting the Local Plan's ability to respond to economic growth over the plan period.

3.3 Policy S/SH: Settlement Hierarchy

3.3.1 Tritax support the proposed wording of Policy S/SH.

3.3.2 Bar Hill is allocated as a 'rural minor settlement'. In relation to rural minor settlements, the supporting policy text states they; *"have a lower level of services, facilities and employment than*

rural centres, but a greater level than most other settlements in Greater Cambridge and often perform a role in terms of providing services and facilities for a small rural hinterland."

3.3.3 When reviewed in the wider context of Greater Cambridge, as set out in the policies supporting text and Figure 14, Bar Hill benefits from a highly strategic location on the A14, which is a clear benefit and locational requirement of the logistics sector. A recent Appeal Decision at Thrapston dated 22nd October 2025 (PINS Reference: 3362393), as appended at **Appendix 9**, "*established that the A14 is a priority route for strategic logistics."* Further to this, vehicular access will be taken from the B1050,

3.3.4 Bar Hill is one of only three 'minor rural centres' located on the A14 corridor and is considered the most appropriate location within Greater Cambridge to support growth in the industrial and logistic sector, being outside of the Green Belt, and in close proximity to the city. Histon and Impington is the only settlement above Bar Hill in the settlement hierarchy but given its Green Belt designation and wider context, is not considered a suitable alternative location for strategic industrial and logistics uses. Tritax Park, Cambridge located at Bar Hill is considered a preferable location for industrial and logistics uses and is not constrained by Green Belt. Furthermore, Bar Hill is well located to both Northstowe and Cambourne, both designated as 'towns' under Policy S/SH, providing a substantial and growing local workforce and a range of supporting services and infrastructure.

3.3.5 Paragraph 148 of the Appeal Decision identifies that the A14; "*was built specifically to link the port of Felixstowe to the national motorway network at the junction with the M1 and M6 and provide access to the Midlands and the North. It is essential for the movement of imported and exported goods across the country with Felixstowe accounting for 5.3% of all freight moved through UK ports in 2023."* The Appeal Decision responds to key Paragraphs 86 (c) and 87 (b) from the NPPF 2024 in addressing barriers to entry and making provision for suitably accessibly locations for the efficient handling of goods. This is consistent with the NPPF 2026 which confirms the unique operational requirements required for the freight and logistics sector at Policy E3.

3.3.6 Paragraph 149 of the Appeal Decision states; "*The A14 consequently plays a critical role in enabling the efficient distribution of goods entering and exiting the UK, connecting them to key distribution centres, manufacturing hubs and retail destinations. As such, it is of national importance and ready access to it directly contributes to growth-supporting infrastructure and the networks that support freight and logistics that the Government has identified as a particular priority*." This is further echoed in the direction of travel set out in the NPPF 2026 with economic growth the number one mission of the government, supported by a suite of policies in Chapter 7 to support a strong and effective economy.

3.4 Policy S/DE: Defined Development Extents

3.4.1 Tritax objects to the proposed wording of Policy S/DE.

3.4.2 These representations support the overall role of Policy S/DE; however, modifications are required to the policy wording to ensure it is effective and justified in enabling sustainable employment development on suitable land, including land located outside defined development extents.

3.4.3 The direction of travel set out in the NPPF 2026 includes a policy on the principle of development outside settlements (Policy S5). The policy seeks to prevent unsustainable patterns of growth and conserve rural character. Development that would be acceptable in principle includes development which would meet an unmet need or which "*echoes what the current presumption in favour of sustainable development would allow where relevant plan policies are out of date, although it adds*

the proviso that in such circumstances development should be well-related to an existing settlement (unless the nature of the use would make this inappropriate), to guard against development being badly-located."

3.4.4 Paragraphs 86 (c) of the NPPF 2024 aims to ensure planning policies address potential barriers to investment. Tritax have a committed occupier and are committed to investment and delivery on the Site. Paragraph 87 highlights that planning policies should address the specific locational requirements of different sectors. Part (b) states that planning policies and decision should make the provision for; "storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain". Policy E3 (Freight and Logistics) of the NPPF 2026 also recognises the need for a sector specific logistics policy; *"because of the particular physical and locational characteristics of logistics developments, which in some cases will involve particularly large structures, and because of the particular importance of having access to the right transport links for the type of operation*." Both adopted and emerging national guidance acknowledges the most suitable location for industrial and logistics must be assessed on merit and may be outside of defined settlement boundaries. This is acknowledged through the Councils currently proposed B8 allocations being outside of a defined settlement boundary.

3.4.5 Policy S/DE establishes a strong presumption against development outside defined development extents unless it falls within a narrow set of exceptions.

3.4.6 While Part 2d provides a mechanism of support for some development outside of defined development extents, as currently drafted, the policy is overly restrictive in its approach to unallocated sites outside defined development extents, which risks placing an undue reliance on larger strategic allocations to meet development needs. Such sites are often subject to longer lead-in times and increased delivery risks, including issues relating to land ownership, infrastructure funding and overall deliverability, which can hinder timely implementation during the plan period.

3.4.7 Tritax's strong credentials and track record of delivery (particularly large strategic sites), supported by the necessary financial capital to deliver without external funding has been demonstrated by a Phase 1 unit, which is pre let and backed by a leading occupier. The first phase of Tritax Park, Cambridge will establish a new parcel distribution facility for a nationally recognised parcel delivery company, supporting sustainable logistics throughout Greater Cambridgeshire.

3.4.8 The policy does not sufficiently recognise that defined development extents are a plan-making tool rather than a definitive test of sustainability.

3.4.9 Policy S/DE is particularly restrictive for employment development that:

- requires larger plots;
- benefits from separation from sensitive residential uses; and
- is logically located outside of settlements in close proximity to the strategic road network rather than within tightly constrained urban areas.

3.4.10 Policy S/DE does not currently provide sufficient flexibility to allow well-related employment development to come forward where impacts can be acceptably managed, in accordance with the NPPF 2024 Paragraphs 86 (c) and 87 (b). Tritax Park, Cambridge is well located to Bar Hill and the A14 strategic road network, providing an appropriate environment in which a strategically important logistics park can be brought forward.

3.4.11 The policy is insufficiently justified in assuming that land outside defined development extents is inherently unsuitable for development. There is no evidence that all land beyond these boundaries is incapable of supporting sustainable development, particularly where impacts can be addressed through design, access, landscaping and phasing. This issue risks undermining the plan's ability to respond positively to changing economic needs over the plan period.

3.4.12 Modifications to the policy should be made to support the logistics and freight sector, outside of defined development extents, which are well located to the strategic road network, support the Cambridge ecosystem and national planning policy guidance and the future direction of travel.

3.5 Policy S/MO: Monitoring

3.5.1 Tritax objects to the proposed wording of Policy S/MO.

3.5.2 Modifications are required to ensure the policy is effective, proportionate and capable of responding to changing circumstances over the plan period. The NPPF 2024 Paragraph 86 (e) states planning policies should; *"be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."*

3.5.3 Furthermore, the NPPF 2026, Policy E1 highlights; "*plans should avoid overly prescriptive requirements on acceptable uses, enabling flexibility to respond to changing commercial property demands*." As currently drafted, Policy S/MO lacks sufficient clarity on how monitoring outcomes will inform decision-making and plan flexibility, which risks limiting its effectiveness in addressing delivery shortfalls or unforeseen constraints.

3.5.4 A central purpose of monitoring is to ensure that the Local Plan remains effective over time, particularly in relation to development delivery. Policy S/MO does not currently provide sufficient flexibility or commitment to action where:

- delivery falls behind anticipated trajectories;
- certain types of development are not being delivered at the required pace; or
- reliance on a limited number of large or complex sites results in delays.

3.5.5 In the absence of a clear mechanism for responding to such circumstances, the policy does not adequately support the timely delivery of development across the plan period. This is essential to address, especially as the Plan does not currently seek to Plan for its full identified objectively assessed employment land need. This will result in a continued under supply and delivery, and puts the emerging Local Plan at risk of not delivering its objectives and the Government's number one mission of economic growth.

3.5.6 Policy S/MO is not fully effective as it does not clearly link monitoring outcomes to potential corrective actions. An effective monitoring policy should allow the planning authority to respond positively where evidence demonstrates that delivery assumptions are not being met.

3.5.7 The policy is insufficiently justified in assuming that monitoring alone will ensure plan delivery, without setting out how the results of monitoring will influence future decision-making or trigger appropriate responses.

3.5.8 It is requested that Policy S/MO is modified to:

- clarify how monitoring outcomes will be used to inform decision-making during the plan period; and
- explicitly acknowledge the need for flexibility where monitoring identifies delivery risks or shortfalls.

3.5.9 This would ensure that monitoring plays an active role in supporting delivery rather than simply recording outcomes.

3.6 Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

3.6.1 Tritax object to Policy S/SHF.

3.6.2 Policy S/SHF places a significant degree of reliance on a single strategic site to deliver up to 220,000 sqm of B2 and B8 commercial floorspace. This level of reliance presents a material risk to the soundness of the emerging Local Plan if the site is not deliverable in full or within the plan period.

3.6.3 The Bidwells B2/B8 Needs note suggest at Paragraph 28 a need for at least 424,900 sqm net additional B2/B8 floorspace; "*we consider the adjustment in GVA to reflect sufficient flexibility if the figure is considered a minimum in accordance with the NPPF".* This figure is above the 317,000 sqm citied in the Iceni Report 2025.

3.6.4 The NPPF 2024 Chapter 6 sets out how the Government intends to build a strong, competitive economy. Paragraph 85 states; "*Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."* In addition, subsequent paragraphs provide further support for economic development, Paragraph 86 (e) requires plans to be "*flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."*

3.6.5 Policy S/SHF responds positively to the direction of travel set out in the NPPF 2026 by recognising the specific locational requirements of the freight and logistics sector, as supported under Policies E2 and E3, this builds upon Paragraph 87 (b) of the NPPF 2024 However, at a strategic level, Tritax Park, Cambridge benefits from the same locational advantages attributed to Slate Hall Farm, including close proximity to Bar Hill and, critically, A14 Junction 25. These shared characteristics and for reasons set out in these representations (when read as a whole) demonstrate that Tritax Park, Cambridge is better positioned to meet the identified needs of the logistics and industrial market.

3.6.6 This is highlighted in Paragraphs 2.6.1 to 2.6.15 of these representations, and the supporting Transport Technical Note (**Appendix 5**) it highlights the convoluted route to the Slate Hall Farm access, and the difficulties attributed with the potential access points which are more likely to interfere with the local road network.

3.6.7 Slate Hall Farm (Cambridge 25) is being promoted by a private development entity. While this approach is not uncommon, there is limited publicly available evidence demonstrating a track record in delivering major industrial or logistics developments of a comparable scale elsewhere in the UK. Experience cited in support of the site relates primarily to mixed-use, city-centre schemes, which differ materially in delivery complexity, funding structures, infrastructure requirements and occupier relationships when compared with large-scale, strategic logistics and industrial parks.

3.6.8 By contrast, Tritax Park, Cambridge is promoted by a developer with a long-established and proven track record in the logistics sector. Tritax is a FTSE 250 company and the owner of the UK's largest logistics development and investment portfolio, valued at £6.82 billion. As a long-term owner and operator, Tritax has consistently demonstrated its ability to deliver complex, large-scale logistics schemes, supported by secure funding structures and established occupier relationships.

3.6.9 The deliverability of Tritax Park, Cambridge is evidenced through part of Phase 1 being partly pre-let to a nationally recognised parcel delivery operator. This will deliver a new parcel distribution facility, supporting sustainable logistics across Greater Cambridgeshire and last mile logistics. Tritax's occupier base across its portfolio includes DPD, Siemens Healthineers, Ocado, Marks & Spencer, Rolls Royce, GXO, Unilever, Harper Collins and Royal Mail, clearly demonstrating its understanding of occupier requirements and market demand.

3.6.10 In contrast, the proposed allocation at Slate Hall Farm places a disproportionate reliance on a site promoted by a developer without a proven delivery record for this scale and type of development.

3.6.11 As referenced in Paragraphs 2.3.1 to 2.3.6, the Council's assessment fails to adequately recognise that Slate Hall Farm lies within the setting of the adjoining Green Belt. As such, the decision to change the site's overall assessment score from red to amber is not fully justified or supported by robust evidence. By contrast, Tritax Park, Cambridge, is not located adjacent to the Green Belt with significant opportunities for enhancement through the proposed mitigation with this being sympathetic to the Landscape Character Area.

3.6.12 The Greater Cambridge Warehouse and Industrial Space Needs Report (Iceni, March 2025) identifies a requirement of around 317,000 sqm (3.4 million sqft) of additional warehouse and industrial floorspace over the next 15 years.

3.6.13 However, even this increased provision falls short of long-term market demand. Section 4.5.8 of the Draft Market Needs Assessment, prepared by Bidwells (and submitted previously, as part of the PPA - **Appendix 10**) states:

"We believe this still falls short of satisfying the demand from occupiers in the immediate and regional markets, based on long-term average annual take-up figures of 375,000 sq ft (local) and 1.5 million sq ft (regional) respectively, particularly considering that take-up in the immediate market will also have been restrained by lack of supply over the past 10 years."

3.6.14 This persistent shortfall highlights a structural issue within plan-making: the difficulty of ensuring that allocations are not only policy compliant but also realistically deliverable in line with market demand.

3.6.15 Further concerns regarding deliverability arise from the recently submitted EIA Scoping Opinion at Slate Hall Farm (LPA Reference: 25/03511/SCOP). Policy S/SHF draft allocates 220,000 sqm of commercial floorspace across 113.3 hectares, including substantial areas of green infrastructure, particularly to the south-east (as per **Figure 2**). However, the EIA Scoping boundary covers only 60.32 hectares, limited to a select Central area of the allocation (as shown in **Figure 3**).

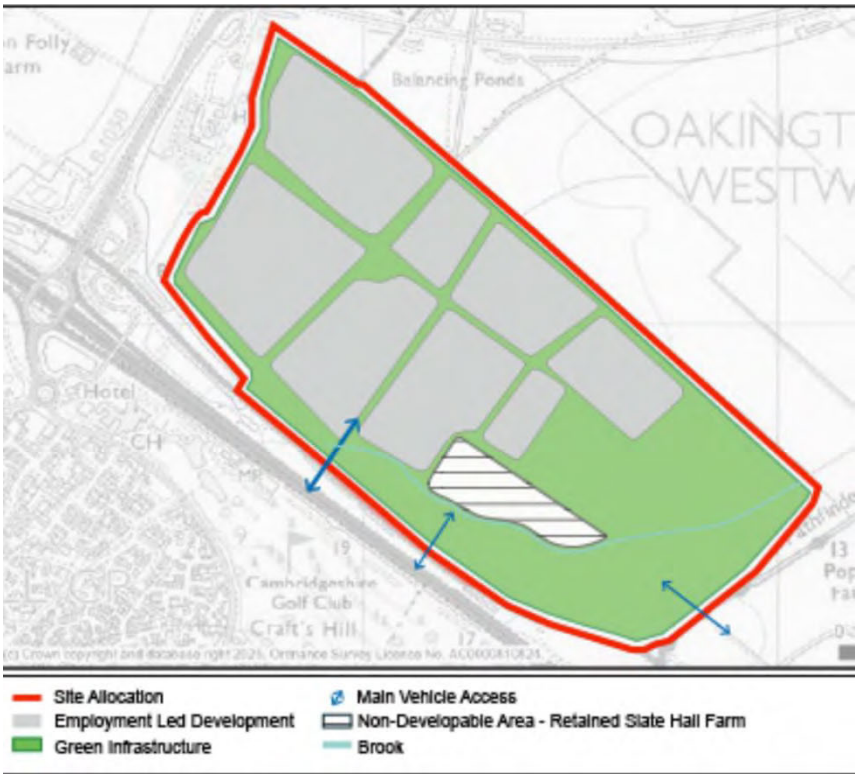

Figure 2: Draft Allocation Area, as per Regulation 18 Consultation

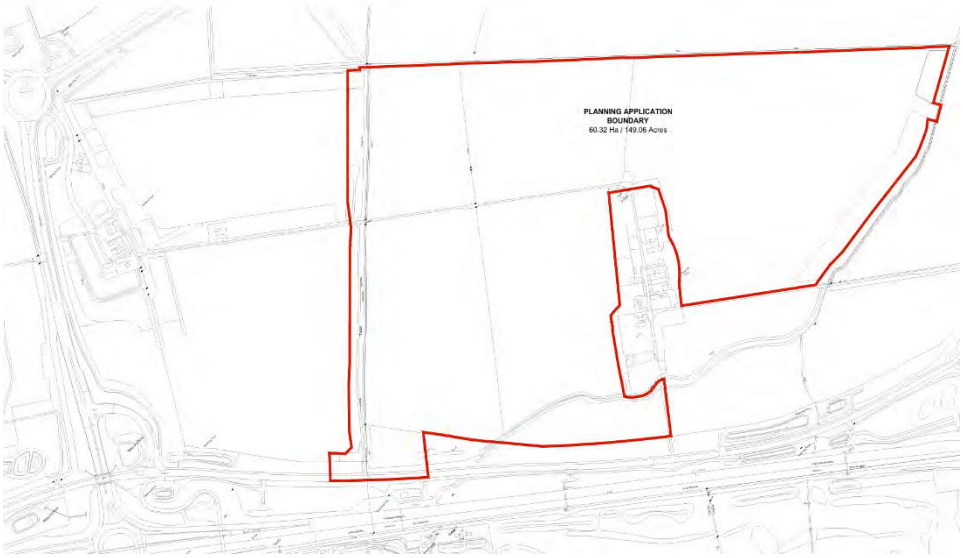

Figure 3: EIA Scoping Boundary - Slate Hall Farm (LPA Reference: 25/03511/SCOP)

3.6.16 The majority of the land required to accommodate the allocated floorspace has been omitted from the EIA Scoping area. This coincides with the fact that the western proportion of the site is earmarked for latter delivery. The EIA Scoping raises questions over challenges to delivery which need to be addressed before development of the site can come forward.

3.6.17 This discrepancy raises serious concerns regarding the site's capacity to deliver the quantum of development proposed and casts doubt on the robustness of the allocation. There is a clear risk that Slate Hall Farm may not deliver the required floorspace within the plan period, thereby

undermining the Local Plan's ability to meet identified employment needs. Furthermore, the Iceni Report makes it clear that; "*a number of the market segments such as warehousing and distribution for the Greater Cambridge market as well as some expanding local manufacturers, will have shorter term requirements, suggesting bringing forward supply in the earlier part of the plan period would be beneficial."* It is therefore imperative that the Local Plan supports the short-term supply of industrial and logistics floorspace to meet an identified need at the earliest opportunity.

3.6.18 In this context, Tritax Park, Cambridge, located adjacent to the preferred allocation, represents a highly deliverable and credible alternative capable of providing essential logistics and advanced manufacturing infrastructure for Greater Cambridgeshire. It is well positioned to support the efficient movement of goods in line with evolving supply chain demands and is demonstrably aligned with the evidence base underpinning Policy S/SHF. As per Paragraph 1.2.4, Tritax Park, Cambridge also can demonstrate their deliverability through an occupier already been in place for Unit 1.

3.6.19 Tritax's strong credentials and track record of delivery, supported by the necessary financial capital to deliver without external funding has been demonstrated by a Phase 1 which is pre let and backed by a leading occupier. Tritax are committed to bringing the Site forward at speed to meet a known need and address it at the earliest opportunity, in line with the Council's evidence base.

3.7 Policy S/RRA: Site allocations in the rest of the rural area

3.7.1 Policy S/RRA/SCS: Land to the south of Cambridge Services, A14:

3.7.2 Tritax have concerns regarding the proposed allocation under Policy SRRA.2. While the site may offer some localised benefits, its limited scale and constrained capacity mean it is unlikely to make a meaningful contribution to meeting the identified strategic need for B2 and B8 accommodation across Greater Cambridge.

3.7.3 The allocation appears to place emphasis on addressing specific operational or ancillary requirements rather than delivering modern, large-scale industrial and logistics floorspace aligned with market demand. In this context, the site's size, coupled with the range of policy constraints and mitigation requirements, raises questions regarding its effectiveness and deliverability, particularly when assessed against the scale of need identified in the supporting evidence base.

3.7.4 As currently drafted, the allocation risks diverting focus away from the delivery of larger, more strategic and demonstrably deliverable sites capable of addressing identified employment land requirements. The role of Policy should therefore be clearly framed as making only a limited and complementary contribution, rather than forming a material component of the Local Plan's strategy for meeting industrial and logistics need.

3.7.5 Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey

3.7.6 The Buckingham Business Park allocation is an extension to the adopted South Cambridgeshire Local Plan established employment area allocation under E/15.

3.7.7 Tritax have no objection to the proposed allocation and notes that the site may make a positive, albeit limited, contribution to the overall supply of employment land within the plan area. The policy for the Buckingway Business Park is focused on B8 uses but limited to smaller premises to meet local needs. The Business Park will provide a much smaller scale of unit to meet a different need to what will be delivered at Tritax Park, Cambridge.

3.7.8 However, due to its scale and capacity, the allocation is not of sufficient size to materially address the identified need for strategic B2 and B8 accommodation set out in the supporting evidence base. As such, whilst the site may assist in meeting local or smaller-scale employment requirements, it should not be relied upon to play a significant role in meeting the wider strategic logistics and industrial demand identified for Greater Cambridge.

3.7.9 The allocation should therefore be viewed as complementary to, rather than a substitute for, larger and more deliverable strategic employment sites capable of accommodating modern logistics and industrial uses at scale.

3.8 Policy CC/SD: Sustainable development and the climate emergency

3.8.1 Tritax supports Policy CC/SD and welcomes its clear, outcome-focused approach to sustainable development. There is however the requirement to add in wording “where appropriate” when outlining the range of issues to address to provide flexibility in the requirements for sustainability statement

3.8.2 The policy aligns closely with the ambitions for Tritax Park, Cambridge, which is being promoted as a landscape-led, low-carbon logistics and advanced manufacturing park, incorporating high-performance buildings, extensive green infrastructure, biodiversity enhancement, sustainable drainage and opportunities for renewable energy generation.

3.8.3 With the added flexibility of ‘where appropriate’, Policy CC/SD is supported, enabling site-specific solutions to climate change mitigation and adaptation while ensuring that strategic employment development can be delivered efficiently and, in a manner, consistent with Greater Cambridge’s sustainability objectives.

3.9 Policy CC/DC: Designing for a changing climate

3.9.1 Tritax supports Policy CC/DC, which sets clear, design-led criteria to ensure high-quality, sustainable, and inclusive places.

3.9.2 The policy aligns with the vision for Tritax Park, Cambridge, where development will be guided by a landscape-led masterplan that prioritises functional site layout, well-designed buildings, active travel, green infrastructure, and connectivity.

3.9.3 The emphasis on good design, adaptability, and placemaking is welcomed, as it will help ensure that new strategic employment sites contribute positively to their setting, enhance user experience, and support long-term resilience. Tritax considers Policy CC/DC’s principles to be both appropriate and capable of guiding development that meets local and regional needs.

3.10 Policy CC/NZ: Net zero carbon new buildings

3.10.1 Tritax object to the proposed wording of Policy CC/NZ.

3.10.2 Although Tritax Park, Cambridge has a named occupier for Phase 1, requiring net zero operational emissions at the shell and core stage is not appropriate where the future end user and operational profile are not yet known. Such a requirement risks imposing impractical obligations and may deter occupier delivery or investment.

3.10.3 Likewise, the reliance on CIBSE TM54 modelling, which is MEP-led, overlaps with energy performance assessments already embedded within Excellent/Outstanding BREEAM

requirements under Ene 01. This duplication may reduce certainty without adding meaningful environmental benefit. Tritax encourages a proportionate, evidence-based approach that reflects realistic delivery stages and aligns with existing standards.

3.11 Policy CC/WE: Water efficiency in new developments

3.11.1 Tritax objects to the proposed wording of Policy CC/WE.

3.11.2 The policy goes beyond national and industry guidance. Recent case law confirms that, while local planning authorities may depart from national policy or guidance where this is justified by local circumstances, such departure is not expected as a matter of course and cannot be assumed to be appropriate in the absence of robust evidence. In R (Rights: Community: Action Ltd) v Secretary of State 2025, the Court of Appeal confirmed that the NPPF 2024 and Written Ministerial Statements constitute guidance rather than binding law, but made clear that any policy divergence must be underpinned by a clear and proportionate rationale, supported by demonstrable evidence of viability. Where this threshold is not met, the imposition of requirements exceeding national policy risks inconsistency, reduced policy certainty and adverse impacts on deliverability.

3.11.3 By effectively mandating rainwater or greywater harvesting on all major developments, the policy does not consider what may be appropriate or deliverable. This is particularly the case for strategic logistics and industrial sites, where such systems may conflict with operational requirements, site constraints, or viability. National policy promotes proportionate, context-led approaches to water efficiency.

3.11.4 Tritax therefore urges that Policy CC/WE be amended to allow flexibility, achievable performance standards, and alternative measures where such systems are unsuitable.

3.12 Policy CC/IW: Integrated water management, sustainable drainage and water quality

3.12.1 Tritax objects to the proposed wording of Policy CC/IW.

3.12.2 The policy places unduly prescriptive requirements on strategic employment sites, including expectations for rainwater and greywater harvesting that may not be appropriate or deliverable in all circumstances.

3.12.3 For large-scale logistics and industrial developments such as Tritax Park, Cambridge, the feasibility of integrated water reuse technologies should be assessed on a site-specific basis, having regard to operational requirements, building use, viability, and infrastructure constraints.

3.12.4 The policy should adopt a flexible, performance-led approach, allowing alternative or equivalent measures to achieve water efficiency and resilience without mandating specific technologies where these are unsuitable.

3.13 Policy CC/FM: Managing flood risk

3.13.1 Tritax supports Policy CC/FM.

3.13.2 Tritax Park, Cambridge will be designed to manage surface water and fluvial flood risk through integrated Sustainable Drainage Systems (SuDS), appropriate modelling, and mitigation measures.

3.13.3 We welcome the policy's emphasis on demonstrating that flood risk can be safely managed throughout the lifetime of development. A Flood Risk Assessment will be developed in line with national policy.

3.14 Policy CC/CE: Supporting a circular economy and sustainable resource use

3.14.1 Tritax objects to the proposed wording of Policy CC/CE.

3.14.2 While Tritax supports the policy's objectives and the promotion of circular economy principles, these are already embedded within Tritax's standard development approach, with embodied carbon routinely assessed through scheme design and delivery.

3.14.3 The requirement for a standalone Circular Economy Statement goes beyond current industry guidance and best practice, risking unnecessary duplication with existing assessments and reporting frameworks. A more proportionate and flexible approach is required, allowing applicants to demonstrate compliance through established sustainability and carbon reporting processes.

3.15 Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

3.15.1 Tritax raise concern over the proposed wording of Policy CC/CS.

3.15.2 While the principle of enhancing land-based carbon sequestration and green infrastructure is supported, aspects go above and beyond industry guidance and established practice. The policy reads as an extension of the Biodiversity Net Gain (hereafter referred to as 'BNG') process, rather than a clearly defined requirement.

3.15.3 Opportunities for land-based carbon sequestration should be proportionate, evidence based and appropriate to the scale and nature of the site, reflecting landscape, ecological and design practice. It is unclear how schemes would be expected to demonstrate a 'meaningful' level of carbon sequestration alongside significant BNG.

3.15.4 Policy CC/CS should provide sufficient flexibility to allow outcomes to be delivered through measures aligned with established guidance, rather than imposing prescriptive expectations that exceed standards.

3.16 Policy BG/BG: Biodiversity and geodiversity

3.16.1 Tritax object to the proposed wording of Policy BG/BG.

3.16.2 The proposed requirement to uplift the mandatory minimum to 20% BNG for major development is considered unsound, as it is not adequately justified and is inconsistent with national policy.

3.16.3 Recent case law confirms that, while local planning authorities may depart from national policy or guidance where this is justified by local circumstances, such departure is not expected as a matter of course and cannot be assumed to be appropriate in the absence of robust evidence. In R (Rights: Community: Action Ltd) v Secretary of State [2025], the Court of Appeal confirmed that the NPPF and Written Ministerial Statements constitute guidance rather than binding law, but made clear that any policy divergence must be underpinned by a clear and proportionate rationale, supported by demonstrable evidence of viability. Where this threshold is not met, the imposition of requirements exceeding national policy risks inconsistency, reduced policy certainty and adverse impacts on deliverability. The BNG uplift is not supported by a robust evidence base and does not sufficiently demonstrate that it is proportionate or deliverable across all sites.

3.16.4 The national BNG framework provides clarity and certainty for plan-making and decision-taking. Any local requirement exceeding the statutory minimum must therefore be clearly justified, flexible, and grounded in site-specific ecological capacity and viability.

3.16.5 Tritax Park, Cambridge will be delivered through a landscape-led masterplan, with at least 40% of the site retained as green and open space and a target of no less than 25% BNG, demonstrating a strong commitment to biodiversity enhancement. This should be considered as a substantial planning benefit in the balance, rather than a fixed policy requirement.

3.16.6 Policy BG/BG risks undermining policy certainty by imposing a fixed uplift beyond the national framework without adequate justification. Any BNG delivered above the mandatory 10% requirement should be treated as a material benefit in the planning balance, rather than a fixed policy requirement.

3.17 Policy BG/GI: Green and blue infrastructure

3.17.1 Tritax support Policy BG/GI.

3.17.2 The policy appropriately recognises the importance of protecting, enhancing and integrating green and blue infrastructure networks within new development. The policy's requirement for development to protect and enhance existing green infrastructure and provide multifunctional, connected and resilient green and blue spaces is consistent with evidence that green infrastructure delivers significant environmental, social and ecological benefits, including biodiversity enhancement, climate adaptation, water management and access to nature for local communities.

3.18 Policy BG/TC: Improving tree canopy cover and the tree population

3.18.1 Tritax strongly objects to the proposed wording of Policy BG/TC.

3.18.2 The statutory requirement to deliver a minimum 10% BNG already provides a robust, outcome-based mechanism for securing ecological enhancement. This framework is flexible, evidence-led and capable of responding to site-specific circumstances. The proposed tree canopy requirement appears to duplicate or cut across the BNG regime, without sufficient justification, and risks prioritising a single ecological metric over a balanced planning judgement.

3.18.3 Chapter 11 of the NPPF 2024 is clear that planning policies should promote the effective use of land in meeting the need for homes and other uses, particularly in sustainable locations. The need for making an effective use of land is further strengthened through the direction of travel set out in L2 of the NPPF 2026, supporting densification. The requirement for major development to demonstrate a minimum of 30% tree canopy cover on site risks introducing an inflexible and prescriptive constraint that could undermine development capacity, density and viability. As such, it is not aligned with national planning policy or with the Government's stated ambition for growth.

3.18.4 The policy and supporting text state that canopy cover should be calculated using a Council-approved calculator or metric. However, neither the policy itself nor the Biodiversity and Green Spaces Topic Paper identifies what calculator or methodology is intended to be used. In the absence of a defined and agreed approach, the policy lacks clarity and certainty.

3.18.5 The policy places an unreasonable and unevidenced burden of developments and will act contrary to the Local Plans and Governments growth ambitions.

3.19 Policy BG/RC: River Corridors

3.19.1 Tritax object to proposed wording of Policy BG/RC.

3.19.2 The policy adopts a restrictive approach that risks undermining the effective use of land, contrary to the NPPF 2024 Chapter 11 and the direction of travel in the NPPF 2026 L2 towards efficient land use of land in sustainable locations.

3.19.3 The blanket requirement to retain or reinstate riparian buffer zones of at least 15m from riverbanks and 10m from ditch bank tops risks sterilising significant areas of land, particularly on rural and edge-of-settlement sites where land drains and engineered drainage features are common.

3.19.4 By relying on River/Ditch definitions derived from the BNG framework, the policy risks treating minor or engineered land drains as equivalent to natural watercourses, triggering fixed buffer requirements regardless of ecological function or sensitivity.

3.19.5 This approach lacks proportionality and could significantly reduce developable area, constrain site layouts and undermine development capacity, contrary to national policy objectives on effective land use.

3.19.6 Policy BG/RC should therefore be amended to adopt a more flexible, allowing for a site specific approach that distinguishes between natural watercourses and engineered land drains.

3.20 Policy BG/EO: Providing and enhancing open spaces

3.20.1 Tritax object to the proposed wording of Policy BG/EO.

3.20.2 The policy is insufficiently flexible and does not reflect the operational and spatial requirements of employment and commercial development, including industrial and logistics uses. Such development relies on efficient building footprints, servicing yards, circulation and security arrangements, which significantly limit the scope for meaningful on-site open space provision.

3.20.3 The NPPF 2024, including the direction of travel set out in Policy L2 of the NPPF 2026, is clear that planning policies should support economic growth and make effective use of land in sustainable locations. Applying a generic open space expectation to commercial development risks constraining efficient site layouts and reducing development capacity, contrary to national policy and the Government's stated ambition to support growth in the commercial and logistics sectors, as set out in Policies E1–E3 of the NPPF 2026.

3.20.4 Notwithstanding this objection, Tritax recognises the value of well-designed green infrastructure within employment environments. At Tritax Park, Cambridge, green infrastructure is delivered as an integral component of a successful employment park, informed by engagement highlighting the importance of wellbeing and recreation alongside employment uses. This includes the exploration of sports facilities, circular walking routes and informal recreational spaces, alongside positive integration with the Bar Hill community through shared amenities and local initiatives.

3.20.5 Policy BG/EO should therefore be reconsidered to allow open space provision to be assessed on a case-by-case basis, adopting a flexible and proportionate approach that recognises the functional requirements of employment uses and aligns with national policy on effective land use, economic growth and plan deliverability.

3.21 Policy WS/NC: Meeting the needs of new and growing Communities

3.21.1 Tritax objects to the proposed wording of Policy WS/NC.

3.21.2 While the principle of supporting sustainable communities is acknowledged, the policy is primarily framed around residential-led growth and is not suitably calibrated for large-scale commercial development.

3.21.3 In particular, the requirement for employment development over 5,000 sqm to be informed by detailed community needs assessments, stakeholder engagement strategies, and potentially community development measures are disproportionate and not justified by national policy. Such requirements risk placing unreasonable and unclear obligations on commercial schemes, whose workforce characteristics, patterns of occupation, and impacts differ fundamentally from residential development.

3.21.4 The policy also lacks clarity on the nature and scope of services and facilities expected to be delivered or funded by commercial development, creating uncertainty and viability risk. Commercial developments already make appropriate contributions through CIL and Section 106 obligations where impacts are clearly evidenced.

3.21.5 The policy should be amended to clearly distinguish between residential and commercial development, ensuring that requirements for community facilities, engagement, and ongoing management are proportionate, evidence-based, and directly related to demonstrable impacts arising from the development, consistent with national planning policy and the statutory tests for planning obligations.

3.22 Policy WS/MU: Meanwhile uses during long term redevelopments

3.22.1 Tritax support Policy SW/MU.

3.22.2 The policy appropriately recognises that some large-scale development proposals may remain temporarily undeveloped for extended periods of time. The application of the policy must be considered on a site-specific basis to ensure that the most appropriate strategy is pursued, which in some circumstances may be to leave land unused.

3.23 Policy WS/IO: Creating inclusive employment and business opportunities through new developments

3.23.1 Tritax supports Policy WS/IO.

3.23.2 The policy appropriately recognises that successful places are shaped not only by physical development but by inclusive, healthy and socially connected environments. The policy's emphasis on social inclusion, health and wellbeing, through accessible services, community facilities, inclusive design and connectivity, aligns with national planning policy and the Local Plan's placemaking objectives.

3.23.3 Tritax recognises inclusive design and community wellbeing as integral to sustainable development. Tritax Park, Cambridge will seek to incorporate measures that support social interaction, accessibility and active lifestyles, helping to create healthy, resilient and socially inclusive places.

3.24 Policy WS/HS Pollution, health and safety

3.24.1 Tritax supports Policy WS/HS.

3.24.2 The policy recognises the importance of ensuring that new development does not result in unacceptable impacts on health, amenity or safety arising from pollution, including noise, vibration, odour, light and air emissions. The policy provides a clear and proportionate framework for addressing these matters through appropriate design, mitigation and assessment, consistent with the Local Plan's wellbeing and social inclusion objectives.

3.24.3 By embedding protections against adverse environmental effects, Policy WS/HS helps to ensure that development supports healthy, safe and inclusive places where people can live, work and visit without exposure to harmful impacts.

3.25 GP/ST: Skyline and tall buildings

3.25.1 Tritax object to the proposed wording of Policy GP/ST.

3.25.2 The NPPF 2024 does not have a policy dedicated to 'tall buildings'. Chapter 11 focuses on making an effective use of land. Paragraph 129 considers densities and allowing planning policies and decisions support development that makes effective use of land including identified needs and market conditions. Chapter 12 considers achieving well designed places with paragraph 135 requiring planning policies and decision to ensure developments 'will function well'. By its very nature, industrial and logistics development therefore needs to provide appropriate heights to meet the needs of a modern occupier.

3.25.3 The NPPF 2026 explicitly recognise the strategic importance of the freight and logistics sector and acknowledge that such development may require large-scale buildings due to its operational and locational characteristics (Policy E3). National policy, therefore, signals that local planning authorities must be prepared to accommodate larger structures where justified.

3.25.4 However, Policy GP/ST and its supporting evidence, including Appendix H, fail to recognise the specific requirements of freight and logistics development or the existence of established employment areas with buildings exceeding domestic scale, such as at Bar Hill. The policy is primarily focused on Cambridge's urban skyline and applies a largely uniform, urban-led approach to all development that breaks the skyline, regardless of context. This is evident in the absence of any requirement for Landscape and Visual Impact Assessment and in the policy's limited engagement with the diverse character of the wider Greater Cambridge area, including South Cambridgeshire. The policy recognises that:

"development in South Cambridgeshire is typically lower in density and domestic in scale, with church towers and spires rising above mature tree canopies to create visual connections between settlements",

3.25.5 It does not adequately acknowledge that some locations, such as Bar Hill, already contain established employment areas with buildings reaching heights well beyond 'domestic' scale. In this context, Appendix H should consider higher thresholds for defining tall or large-scale buildings in areas adjacent to, or outside, defined development extents and within established employment locations.

3.25.6 As drafted, the policy risks unduly constraining appropriate industrial and logistics development by applying assessment criteria designed for urban landmark buildings to rural and employment locations where such an approach is disproportionate. Appendix H should, therefore, adopt higher

thresholds and a more context-sensitive approach in established employment areas and locations beyond defined development extents.

3.26 Policy GP/LC: Protection and enhancement of landscape character

3.26.1 Tritax supports Policy GP/LC.

3.26.2 The policy appropriately recognises the importance of safeguarding and enhancing landscape character and green corridors across the Greater Cambridge area. The policy's requirement for development to respond positively to its landscape context is consistent with national planning policy objectives relating to environmental protection and landscape quality.

3.26.3 In this context, Tritax Park, Cambridge demonstrates how development can respond positively to landscape character and environmental sensitivities. The scheme integrates high-quality buildings with a strong green infrastructure framework, with at least 40% of the site retained as open green space and a minimum of 25% BNG, ensuring that landscape character and ecological value are meaningfully enhanced.

3.26.4 Slate Hall Farm lies adjacent to the Green Belt; however, the Local Plan does not currently acknowledge this relationship, nor does it provide evidence demonstrating how this sensitive boundary will be protected and enhanced in accordance with Policy GP/LC.

3.27 Policy GP/HE: Historic environment

3.27.1 Tritax objects to the proposed wording of Policy GP/HE.

3.27.2 Part 2(b) is overly prescriptive and not fully consistent with national policy or the statutory framework for decision-making in the historic environment. The use of the word "must" risks precluding high-quality, sustainable development by implying an absolute requirement to conserve or enhance heritage assets in all circumstances, rather than allowing for a balanced planning judgement.

3.27.3 National policy and legislation require decision-makers to have special regard to the desirability of preserving heritage assets, while weighing this against the scale of harm, site context and public benefits.

3.27.4 The direction of travel set in the NPPF 2026, Policy H1 "retains the expectation that local planning authorities prepare a positive strategy for the historic environment, while providing clearer guidance on the factors that should inform this strategy and how these can align with wider planning objectives".

3.27.5 Policy GP/HE should be amended to adopt more proportionate wording that reflects this balanced approach, consistent with the NPPF 2024 and statutory duties.

3.28 Policy GP/HA: Designated heritage assets

3.28.1 Tritax objects to the proposed wording of Policy GP/HA.

3.28.2 As drafted, the policy does not allow for any harm to designated heritage assets and fails to reflect the balancing exercise required by both national policy and legislation.

3.28.3 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require decision-makers to have special regard to the desirability of preserving the setting of listed buildings and to pay special attention to preserving or enhancing the character or appearance of conservation areas. These statutory duties do not impose an absolute prohibition on harm but instead require any harm to be clearly identified and weighed in the planning balance.

3.28.4 The NPPF 2024 allows for harm to designated heritage assets where this is justified and outweighed by public benefits, following a structured assessment of heritage significance, the extent of harm and the justification for the proposal. Policy GP/HA does not reflect this approach and is therefore inconsistent with national policy and the statutory framework.

3.28.5 Policy HE5 of the NPPF 2026 also highlights the governments direction of travel and acknowledges there may be harm to assets; "*it introduces clearer guidance on the full range of potential impacts on these assets - from positive effects to total loss of significance - recognising that development can improve heritage outcomes*"

3.28.6 The use of mandatory language in Part 2 of the policy, particularly the requirement that proposals "must" meet the stated criteria, overstates the statutory and policy tests and removes necessary scope for professional judgement and balanced decision-making. Furthermore, criteria 2(b) to 2(d) adopt a highly restrictive approach by requiring development to be of an "appropriate" scale, form, height and massing. When applied to development of a different typology or scale, such as strategic or employment development, these criteria risk precluding otherwise acceptable schemes regardless of wider public benefits. This conflicts with the NPPF 2026, including Policy E3, which recognises that logistics development may involve particularly large structures.

3.28.7 Policy GP/HA should therefore be amended to adopt more proportionate wording that reflects the statutory duties and the NPPF 2024's balanced approach, allowing impacts on heritage significance to be assessed in the round, taking account of scale, context and public benefits.

3.29 Policy GP/ND: Non-designated heritage assets

3.29.1 Tritax objects to the proposed wording of Policy GP/NP.

3.29.2 The policy goes beyond national planning policy by seeking to "*ensure the retention and enhancement*" of non-designated heritage assets. The NPPF 2024 does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits.

3.29.3 The NPPF 2026 Policy HE7 considers decisions on non-designated heritage assets and aims to clarify how proposals affecting non-designated heritage assets should be assessed.

3.29.4 Policy GP/ND should be amended to reflect the NPPF 2024's proportionate approach and allow impacts to be assessed through balanced decision-making.

3.30 Policy GP/AR: Archaeology

3.30.1 Tritax support the proposed wording of Policy GP/AR.

3.30.2 Tritax Park, Cambridge is recognised as having the potential to contain archaeological remains. Further assessment and investigation would be undertaken at the appropriate stage to establish the nature, extent and significance of any assets present, in consultation with the relevant

archaeological advisors. The emerging approach would seek, where feasible, to preserve archaeological remain in situ through sensitive design.

3.30.3 Where preservation in situ is not possible, appropriate mitigation would be secured though investigation, recording and reporting, proportionate to the significance of the remains in accordance with national and local policy. This approach would ensure the archaeological considerations are satisfactorily embedded within the development, allowing the site to come forward in a manner that appropriately balances heritage protection with the delivery of sustainable development.

3.31 J/NE: New Employment Development Proposals

3.31.1 Tritax object to the proposed wording of Policy J/NE.

3.31.2 The policy is overly prescriptive and risks unduly restricting the delivery of large-scale industrial and logistics development serving national and regional needs. In particular, Part 7 imposes disproportionate constraints on warehousing and distribution uses, limiting the Plan's ability to respond effectively to changing economic and employment requirements.

3.31.3 The NPPF 2024 sets out in Chapter 6 how the Government wants to build a strong, competitive economy. Paragraph 85 makes it clear; *"planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be places on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."* Paragraph 86 (e) highlights planning policies should be; *"flexible enough to accommodate needs not anticipated in the plan.... to enable rapid responses to changes in economic circumstances."*

3.31.4 The NPPF 2024 goes further in Paragraph 87 to confirm planning policies and decisions should recognise and address the specific locational requirements of different sectors. Part (b) of the paragraph deals specifically with making provision for "storage and distribution uses at a variety of scales in suitably accessible locations that allow for the efficient and reliable handling of goods."

3.31.5 As set out in the accompanying 'Need for B2/B8 in Greater Cambridge note prepared by Bidwells (January 2026); "*By 2024, Oxford Economics local forecasts (April 2025) showed that only 9.7% to of the total GVA generated by Greater Cambridge was from the Manufacturing and Transport and Storage sectors1 ("the B2/B8 sectors"), compared to 14.7% for the entire Cambridge to Oxford Arc. Clearly there has been an intentional suppression of these industrial sectors in Greater Cambridge through planning policy since at least the 1990s and is now manifesting itself through a notable difference in economic output."*

3.31.6 This approach is inconsistent with the direction of travel in the NPPF 2026. Paragraph E1 emphasises that plans supporting long-term economic growth should avoid overly prescriptive requirements on acceptable uses and instead enable flexibility to respond to evolving commercial property demands. Paragraph E3 further recognises the particular physical and locational characteristics of freight and logistics development, including the need for access to strategic transport infrastructure and, in some cases, larger buildings. Policy J/NE does not sufficiently reflect this national policy context.

3.31.7 Recent Appeal Decisions reinforce the importance of flexibility and choice within employment land markets. In the Beehive Call In decision (PINS Reference: 3360616), the Inspector emphasised that maintaining an adequate and diverse supply of employment land is critical to keeping the market fluid, accelerating delivery, and reducing the risk of investment being lost overseas. The

decision makes clear that quantitative targets, including those in the Iceni analysis The Greater Cambridge Growth Sectors Study (September 2024), should be treated as reference points rather than caps, and that a diversity of site types, locations and offers is essential to meeting demand and maximising job creation.

3.31.8 The policy creates a disproportionate bar for industrial and logistics development, which typically requires larger plots, specific access arrangements and locations beyond tightly constrained settlement boundaries.

3.31.9 The policy therefore risks excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land, contrary to national policy and recent appeal findings. It is not fully effective, as it may prevent appropriate industrial and logistics schemes from coming forward simply because they cannot satisfy the policy requirements, despite being sustainable in principle.

3.31.10 The Bidwells B2/B8 Needs note suggest at Paragraph 28 a need for at least 424,900 sqm net additional B2/B8 floorspace; "*we consider the adjustment in GVA to reflect sufficient flexibility if the figure is considered a minimum in accordance with the NPPF".* This figure is above the 317,000 sqm citied in the Iceni Report 2025.

3.31.11 It is requested that Policy J/NE is modified to adopt a more proportionate and flexible approach, explicitly recognising the distinct characteristics of industrial and logistics development. This should allow proposals in rural and edge-of-settlement locations to be assessed on their individual merits where they can demonstrate sustainability, suitable access and appropriately managed impacts. Such an approach would better align the policy with national guidance, the Local Plan evidence base, and the clear findings of recent appeal decisions.

3.32 Policy J/AL: Protecting the best agricultural land

3.32.1 Tritax object to the proposed wording of Policy J/AL.

3.32.2 The current wording of criterion (1)(b) places an unduly onerous and potentially unrealistic burden on land promoters and landowners, particularly where sites contain Grade 1, 2 or 3a agricultural land.

3.32.3 While the policy appropriately reflects the principle that the irreversible loss of high-quality agricultural land should be avoided where possible, the requirement to demonstrate that "*the development cannot be located on areas of poorer quality land*" is overly prescriptive. This goes beyond national policy, which states at Footnote 65 of the NPPF 2024 that, where significant development of agricultural land is necessary, areas of poorer quality land should be preferred, rather than requiring proof that no alternative location exists.

3.32.4 As drafted, the policy effectively introduces an agricultural land sequential test, similar to that applied in flood risk policy. This approach is not supported by national guidance and places a disproportionate evidential burden on applicants. The policy should therefore be amended to align with national policy.

3.32.5 Land in the Greater Cambridge area is subject to significant development pressure, and lower-grade agricultural land may not be available, deliverable or sustainable due to ownership constraints, infrastructure capacity, access limitations, environmental designations or competing development needs. In this context, the policy risks preventing sustainable, plan-led development regardless of wider benefits. This is inconsistent with national policy, which requires impacts on

agricultural land to be balanced against wider sustainability and development objectives through the planning balance.

3.33 J/AW: Affordable workspace and creative industries

3.33.1 Tritax objects to the proposed wording of Policy J/AW.

3.33.2 In its current form, it is not possible to provide comprehensive comments on the policy wording. The Council acknowledges they are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage and the level of discounts.

3.33.3 The Councils supporting evidence base, Topic Paper 6, uses London as a benchmark for affordable workspace provision. London provides a very contextually different market in respect to both economic conditions / land values and the scale of units that may be delivered.

3.33.4 Tritax Park, Cambridge will comprise large B8 sheds and providing an affordable provision on the Site is not considered to be appropriate or feasible. It will conflict with national priorities for making an effective use of land and Tritax Park is not likely to be seen as an appropriate location for start ups, the focus of an affordable workspace policy.

3.33.5 Further clarity is needed on the types of development which will trigger Policy J/AW. Large strategic logistic developments are not considered suitable to provide smaller, affordable units as part of the overall development.

3.33.6 Large-format employment and logistics developments are typically designed for single occupiers and are not compatible with subdivided, small-scale units. Requiring on-site affordable workspace in such circumstances risks constraining efficient site layout and undermining economic viability.

3.33.7 The need for, and form of, affordable workspace provision should therefore be considered on a case-by-case basis, informed by site characteristics, intended occupiers, operational requirements and local evidence of demand, with flexibility to allow alternative approaches where on-site provision would be impractical or ineffective.

3.34 Policy J/EP: Supporting a range of facilities in employment parks

3.34.1 Tritax support policy J/EP.

3.34.2 Tritax recognise the benefits delivered through meaningful facilities on employment parks.

3.34.3 As part of the public consultation, feedback was gathered on the types of facilities the community would like to see. Tritax Park, Cambridge will provide facilities for employees, visitors and local residents, provisionally including sports facilities and circular walking routes to promote recreation and wellbeing.

3.35 Policy I/ST: Sustainable transport and connectivity

3.35.1 Tritax object to the proposed wording of Policy I/ST.

3.35.2 The NPPF 2024 Chapter 9 seeks to promote sustainable transports with paragraph 110 stating; "*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."* Further details are set out in Paragraphs 115 – 117 highlighting how authorities should consider development

proposals ensuring sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location. Chapter 6 seeks to build a strong competitive economy with Paragraph 86 (b) highlighting planning policies and decisions should make provision for; “storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain,”

3.35.3 The direction of travel set out in the NPPF 2026 provides important clarity that the Government recognises the specific locational and operational requirements of freight and logistics development. Proposed Policy E3 (Freight and Logistics) confirms that a sector-specific approach is necessary due to the scale of development and the critical importance of access to strategic transport infrastructure.

3.35.4 The direction of travel set out in the NPPF 2026 acknowledges that logistics developments will not always align with traditional urban sustainable travel patterns, and that locational suitability must be assessed in the round, having regard to the functional needs of the sector alongside proportionate sustainability measures.

3.35.5 The accompanying Transport Technical Note (5030488) provides further detail on how Tritax Park, Cambridge benefits from sustainable transport and connectivity. This includes the locational benefits provided through the A14 / B1050 / A1307 road network alongside public transport & active travel opportunities that support the sustainable development of the Site.

3.35.6 Within this context, the application of Policy I/ST must reflect the nature of the proposed development. Tritax Park, Cambridge demonstrates a balanced and policy-compliant approach by combining an appropriate strategic location with a strong package of sustainable transport measures.

3.35.7 Tritax Park, Cambridge adjoins an existing pedestrian and cycle route connecting Longstanton and Northstowe to the north, and Bar Hill to the south, providing direct access to the wider active travel network. Opportunities to enhance public transport accessibility will also be delivered, including potential diversion of existing bus services or the provision of new bus stops, enabling access to half-hourly services between Northstowe and Cambridge City Centre via the Guided Busway.

3.35.8 Vehicular access is proposed from the B1050 via a new signalised junction, providing direct connectivity to the A1307 and the A14 at Junction 25. This strategic location supports efficient freight movement while minimising wider network impacts, consistent with the objectives of Policy I/ST.

3.35.9 Overall, Tritax Park, Cambridge, appropriately balances the locational requirements of freight and logistics development with proportionate and effective sustainable transport measures, as supported by the direction of travel in the NPPF 2026.

3.36 Policy I/TH: Travel Hub facilities

3.36.1 Tritax support policy I/TH.

3.36.2 Tritax recognise its role in supporting the development of new travel hubs and the improvement of existing sustainable transport infrastructure to deliver modal shift away from private car use in line with Local Plan objectives and direction of travel.

3.36.3 Tritax Park, Cambridge, is currently exploring options for sustainable transport enhancements, including the potential for a travel hub facility and the rerouting of bus services to better integrate with wider active travel and public transport networks.

3.37 Policy I/EV: Parking and electric vehicles

3.37.1 Tritax objects to the proposed wording of Policy I/EV.

3.37.2 The policy would be more effective if it clearly recognised that car parking and EV charging provision must respond to the specific characteristics of individual sites. Large or complex developments often have distinct operational requirements, travel patterns and accessibility constraints that cannot be addressed through uniform or prescriptive standards.

3.37.3 Tritax supports the objective of ensuring parking provision reflects land use, location, accessibility and EV infrastructure. The policy should therefore adopt a proportionate, evidence-based and site-specific approach, consistent with national policy, to support sustainable transport objectives without undermining development viability or deliverability.

3.38 I/SD: Servicing and last-mile delivery

3.38.1 Tritax object to the proposed wording of Policy I/SD.

3.38.2 The supporting text is heavily focused on built-up urban areas and defines micro-consolidation centres as small-scale facilities within or close to town and neighbourhood centres. This approach risks unduly constraining delivery and fails to provide sufficient flexibility for rural and edge-of-settlement employment sites, contrary to national planning policy.

3.38.3 The NPPF (2024) Chapter 6 focuses on building a strong competitive economy. Paragraph 85 states; *"significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."* Further detail is set out in Paragraph 86 (e) which says planning policies should; *"be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."*

3.38.4 The NPPF 2026 provides a clear direction of travel. Policy E2 confirms that substantial weight should be given to the economic benefits of commercial development, including freight and logistics, while Policy E3 recognises the sector's specific physical and locational requirements, including the need for access to strategic transport infrastructure and, in some cases, larger-scale buildings. National policy therefore anticipates that logistics and servicing functions may be more appropriately located at accessible rural or edge-of-settlement sites, where impacts can be effectively managed.

3.38.5 Policy I/SD should therefore be amended to explicitly support; (1) consolidation facilities at edge-of-settlement and rural locations serving nearby towns, villages and business areas; and (2) consolidation facilities that exceed "micro" scale where justified, provided they deliver equivalent outcomes in reduced vehicle mileage, lower emissions and improved delivery efficiency.

3.38.6 These changes would ensure Policy I/SD functions as a positive enabler of sustainable logistics development. This approach aligns with proposals such as Tritax Park, Cambridge, which will

deliver strategically located logistics infrastructure supporting efficient, lower-emission last-mile distribution in line with national policy objectives.

3.39 Policy I/EI: Energy infrastructure masterplanning

3.39.1 Tritax supports of Policy I/EI.

3.39.2 The policy appropriately recognises the need for new development to be underpinned by resilient, future-proofed and low-carbon energy infrastructure, consistent with national and local climate objectives and emerging energy system requirements.

3.39.3 Tritax places sustainability and energy efficiency at the heart of its projects, with new buildings designed to achieve net zero carbon in construction, alongside EPC A ratings and BREEAM Excellent as a minimum target.

APPENDIX 1
SITE LOCATION PLAN

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Legend

Application Area 123.11 hectares

notes

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no. date revision by

aja architects
1170 Elliott Court
Herald Avenue
Coventry Business Park
COVENTRY CV5 6UB
T: 024 7625 3200
E: aja@aja-architects.com
W: www.aja-architects.com

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client

TRITAX BIG BOX

project

Tritax Park
Cambridge

drawing

Site Location Plan

scale 1:3500 @ A1 drawn mjl

checked date 19.06.25

no

7538 - 15

0m 10 20 40 70 100m 150 200m
Scale Bar

APPENDIX 2
FLOOD RISK TECHNICAL NOTE

REGULATION 18 – FLOOD RISK INPUT

VERSION	DATE	PROJECT NUMBER AND NAME	CREATED	CHECKED	REVIEWED
1.0	29/01/2026	5030488 – Tritax Park, Cambridge	BS	SW	BM

1. INTRODUCTION

1.1.1. This technical note has been produced on behalf of Tritax Big Box Developments Limited to support promotion of the site for inclusion within the emerging local plan.

1.1.2. This Flood Risk Technical Note should be read in conjunction with the Regulation 18 Consultation representations prepared by Bidwells LLP in relation to Tritax Park, Cambridge, of which this note is appended.

1.1.3. Tritax Big Box Developments (hereafter referred to as 'Tritax') have an interest in land north of Bar Hill at Junction 25 of the A14, known hereafter as 'the Site'.

1.1.4. Tritax Park, Cambridge (Land north of the A14, Bar Hill) has been assessed under HELAA Site ID 40121 and 40244. HELAA Site ID 40121 (refers to the whole parcel which has been promoted under the PPA undertaken with the Council).

1.1.5. Tritax have entered into a Planning Performance Agreement (hereafter referred to as 'PPA', LPA Reference: PPA/25/0034) with Greater Cambridge Shared Planning Services to support pre-application discussions relating to land at Tritax Park, Cambridge. There has also been an Environmental Impact Assessment Scoping Opinion (hereafter referred to as 'EIA') submitted on the site (LPA Reference: 25/03990/SCOP) of up to 235,5000 sqm of Warehousing and Distribution space with ancillary use.

1.1.6. Tritax is bringing forwar proposals for Tritax Park, Cambridge, a state-of-the-art logistics and advanced manufacturing park located to the north of Bar Hill, in close proximity to the A14 (Junction 25). The proposed development will provide essential infrastructure to support the efficient and reliable movement of goods, respond to evolving supply chain demands, and deliver significant economic benefits at a local and sub-regional level.

1.1.7. In light of recent changes to flood risk policy and mapping, we have reviewed these changes and carried out a technical review of flood risk to the site. Based on the latest flood risk information and policy, we suggest some key items for consideration when comparing flood risk between competing sites, which we understand has been a factor weighed in the overall site selection process to date.

2. RECENT POLICY AND GUIDANCE

2.1. Planning Practice Guidance (PPG)

2.1.1. The Planning Practice Guidance on Flood Risk and Coastal Change[1] was updated in September 2025. Most notably, this takes a pragmatic view of when the Sequential Test is required:

[1] Flood risk and coastal change - GOV.UK

"In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."

2.1.2. Changes to the PPG reflect an industrywide movement towards a more pragmatic approach. Developments should be empowered to mitigate flood risk through design, thereby freeing up land and opportunities to reduce the risk of offsite flooding in the process.

2.2. National Planning Policy Framework (NPPF)

2.2.1. Draft updates to the NPPF[2] look to align the Flood Risk policy with the current Planning Practice Guidance.

2.3. Preparing a flood risk assessment: standing advice (Environment Agency)

2.3.1. The EA's standing advice for preparing a Flood Risk Assessment[3] suggests that:

"You may not need a sequential test if development can be laid out so that only elements such as public open space, biodiversity and amenity areas are located in areas at risk of any source of current or future flooding."

2.3.2. The above advice provides useful context that areas within the site boundary that are at risk of flooding should not be considered as a risk to the development, provided the site is appropriately laid out.

2.4. Recent cases

2.4.1. There have been a number of recent appeal decisions and court judgements (see below) which have focused on the Sequential Test (ST) and how failing the ST, or not undertaking one, should not preclude development so long as there are sufficient other benefits to the proposals that outweigh the risk of flooding to a site.

- Mead Realisations vs Secretary of State (Mead)
- Persimmon vs North Somerset (Yatton)
- Gladman vs Swale BC (Faversham)
- Taylor Wimpey vs East Devon DC (Feniton)
- Fairfax vs Dacorum BC (Hemel)

2.4.2. In developing the Local Plan, you are undertaking a ST to identify priority sites for inclusion. It is important that the actual risk posed by flooding is considered when undertaking this test, rather than simply looking at the area of flood extents.

2.4.3. A recent appeal case ('Land west of Sea View Drive, Hest Bank, Lancaster, LA2 6BZ PINS Ref: APP/A2335/W/24/3350855) was decided in favour of the appellant as the risk of flooding to the site both now and in the future was classified as low, taking into account not just the extent of flooding but the consequences that may arise as a result of the flooding. It accepted that Flood

[2] National Planning Policy Framework: draft text for consultation
[3] Preparing a flood risk assessment: standing advice - GOV.UK

Hazard is the most appropriate measure for assessing flood risk as it '*brings together both the likelihood and consequences of flooding to measure overall risk*'. In contrast, an assessment based solely on the flood extents simply assesses the probability of an area becoming wet without any consideration for the consequences.

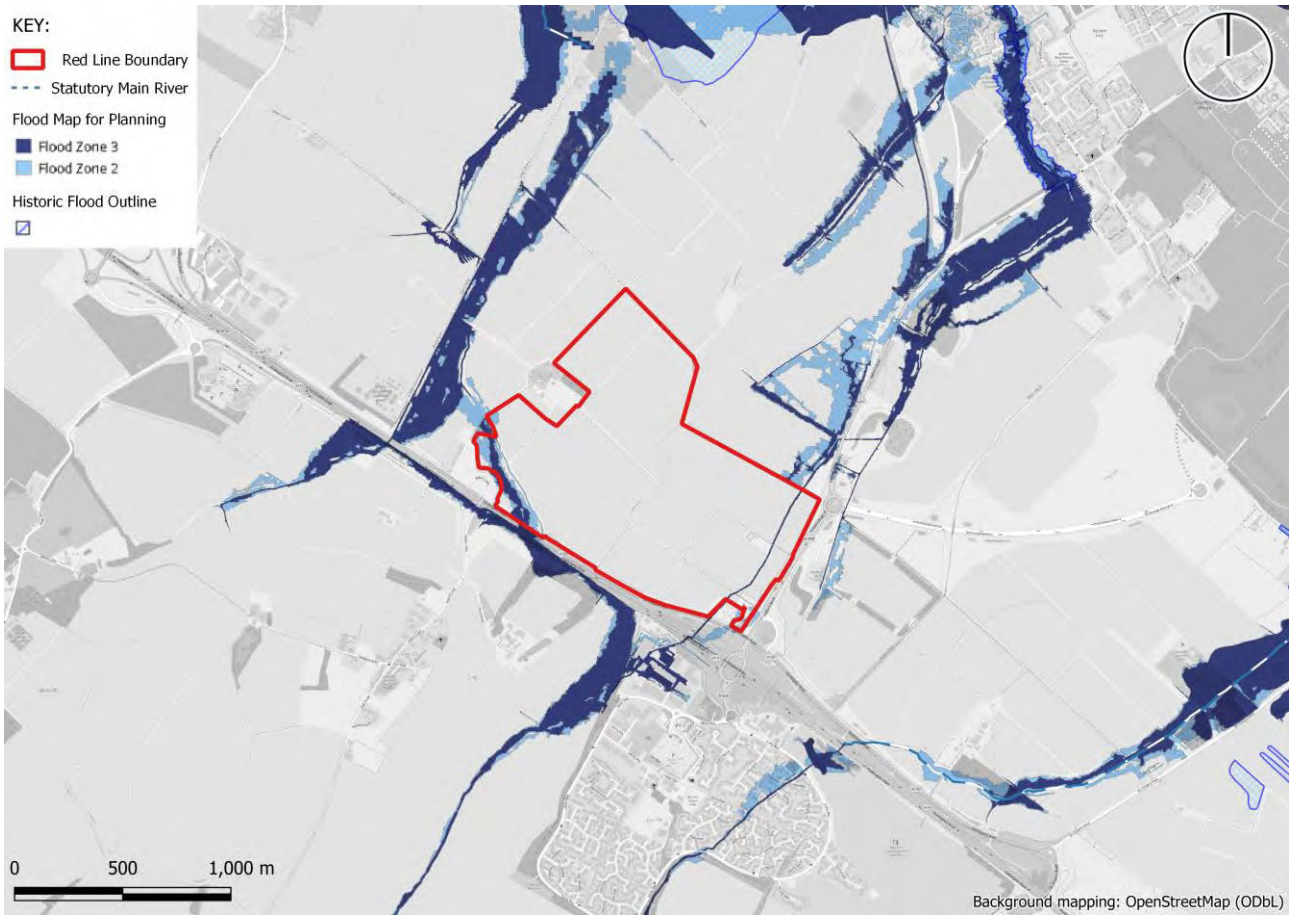
2.4.4. It is recommended that flood hazard is considered when assessing the risk of flooding to this and other sites. This is particularly important when assessing surface water as shallow ponding of surface water due to rain falling on a site should not be considered equivalent to potentially deep and fast flowing overland surface water flow routes that are generated offsite.

3. OVERVIEW OF FLOOD RISK FROM ALL SOURCES

3.1. Fluvial:

3.1.1. The majority of the site lies within Flood Zone 1 (see Figure 1), classified as having a low risk of fluvial or tidal flooding. The western corner of the site is classified as Flood Zone 2 and 3, associated with the unnamed ditch that runs through the site in this location. There is a narrow strip of Flood Zone 3 at the east of the site associated with in channel flow within the Longstanton Brook, which is an ordinary watercourse that flows from south to north.

Figure 1: EA's Fluvial Flood Zone Mapping



3.1.2. The parts of the site classified as Flood Zone 2 and 3 will be used (with no changes to existing ground levels) for public open space, biodiversity and / or amenity, with the exception of a crossing of the Longstanton Brook to facilitate access.

3.1.3. All flows for the 1% and 0.1% AP events (Flood Zones 3 and 2, respectively) are contained within the channel of the Longstanton Brook.

3.1.4. The proposed access crossing will provide 600 mm of freeboard above the top of bank and any supporting embankments (or similar) will be located outside of the Flood Zones. Therefore, there will be no built development within Flood Zone 2 or 3.

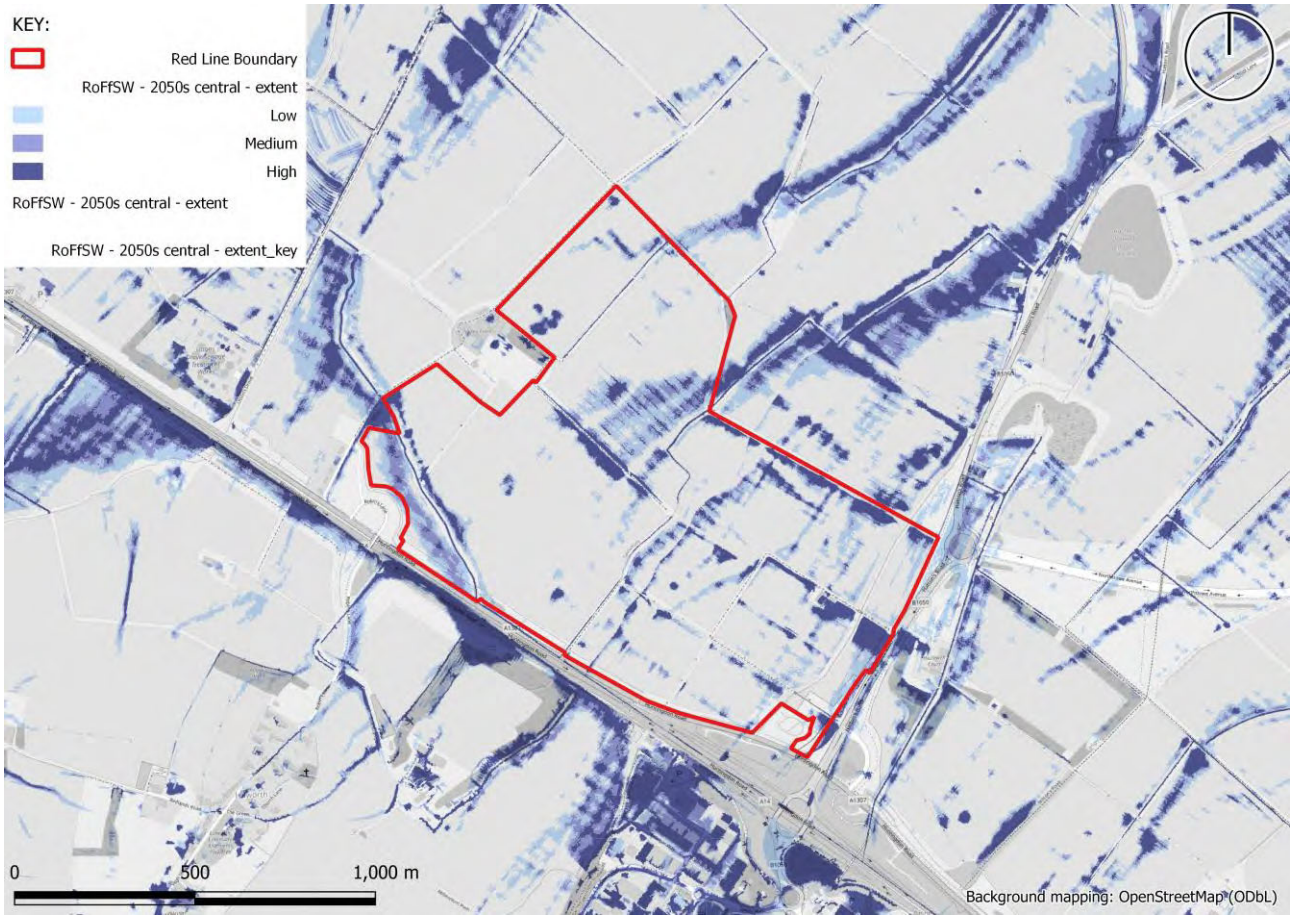
3.1.5. The EA have been contacted regarding the site and they do not consider a pre-application meeting a requirement due to the low risk of flooding to the site. The EA do not consider that bespoke flood modelling is required for the site as all development has been located outside of flood zone areas.

3.1.6. In summary, any potential risk of fluvial flooding to the development has been designed out and the site access will be designed to mitigate any risk of blockage. Therefore, the risk of fluvial flooding to the site is low.

3.2. Surface water:

3.2.1. Based on the EA's risk of flooding from surface water mapping, there is a high probability of surface water flooding in the present day and future climate change (2050's central allowance) scenarios, see Figure 2.

Figure 2: Risk of Flooding from Surface Water extents - 2050's central allowance

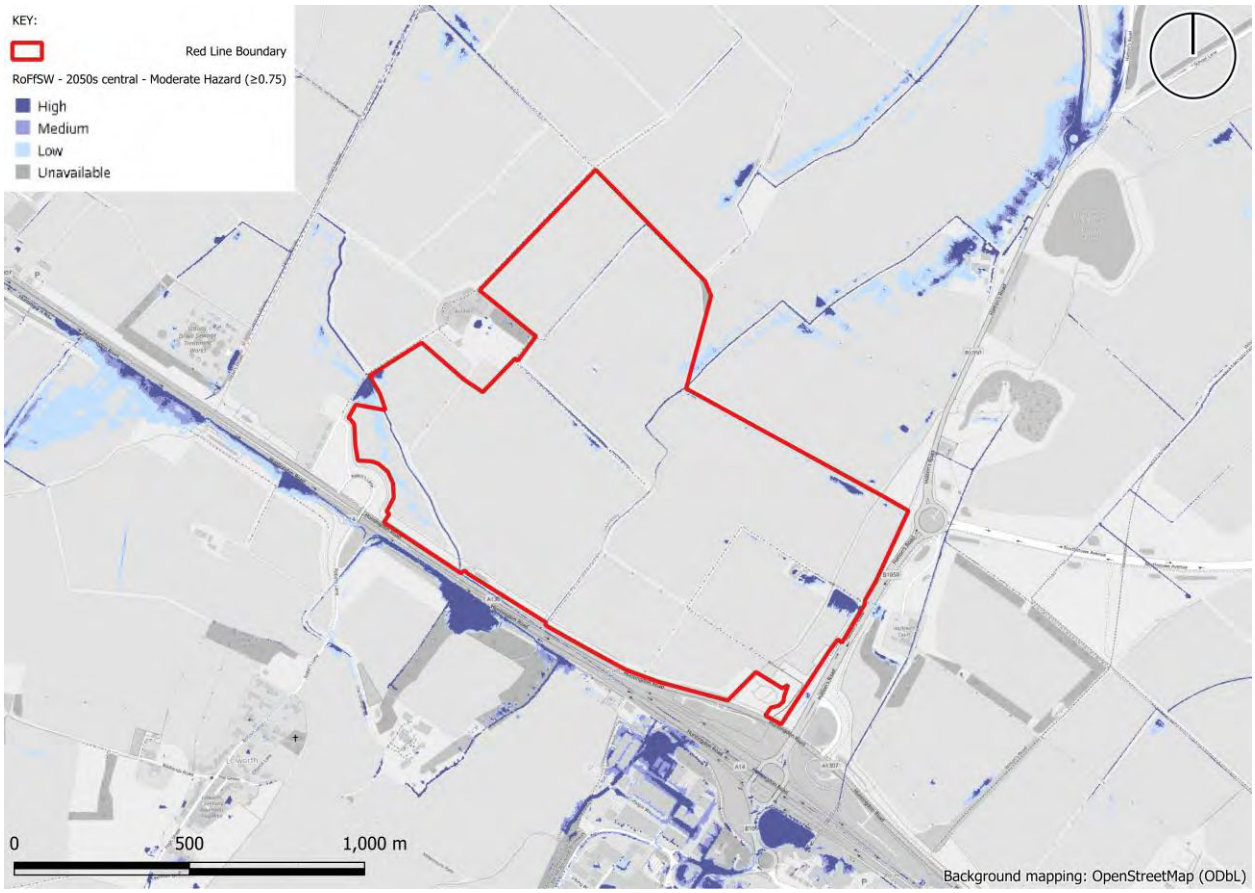


3.2.2. Surface water flooding in the western corner of the site is related to the unnamed watercourse running through that part of the site, as discussed under the previous section on fluvial flood risk. No development is proposed within this area to ensure surface water flows are not affected and there is no loss of flood storage.

3.2.3. Surface water flooding across the rest of the site is due to surface water runoff generated by rain falling on the site, which would be dealt with as part of the proposed drainage strategy - peak flows from the site would be greatly reduced during extreme rainfall events.

3.2.4. Whilst the probability of surface water flooding is high, the risk associated with this flooding is low. Flood Hazard Rating is used to assess the risk of flooding to people based on the depth and velocity of floodwater). The probability of the surface water being classified as having a moderate flood hazard (i.e. Danger for Some, such as children or the elderly) is shown on Figure 3.

Figure 3: Risk of Flooding from Surface Water mapping - Moderate Flood Hazard - 2050s central allowance



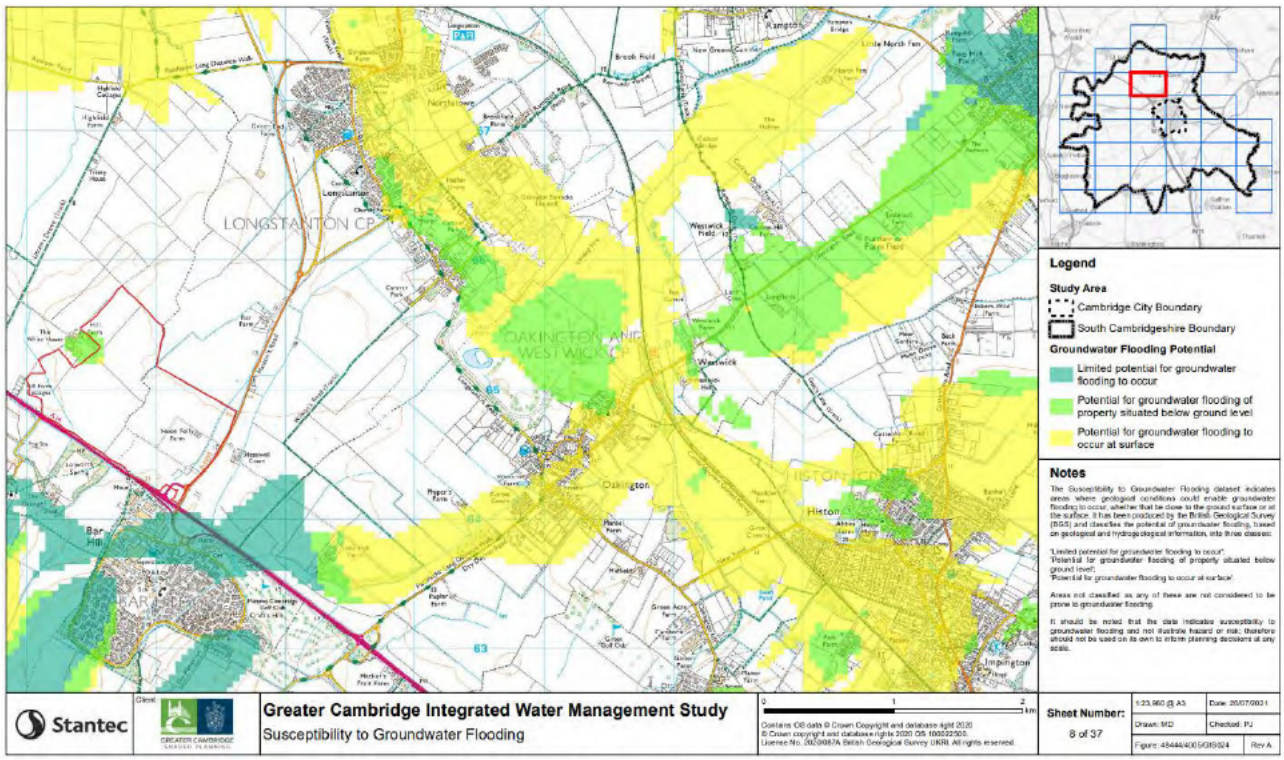
3.2.5. It is evident from the Flood Hazard mapping that the majority of the site has a low flood hazard rating (i.e. less than moderate) and therefore there is very little risk to the site or its future users from surface water flooding. The moderate flood hazard mapping identifies areas of the site where there could be a risk to people. There are small pockets of moderate (or greater) flood hazard where surface water ponds in localised depressions, such as along the eastern and north-eastern boundaries. These areas will be appropriately mitigated through the drainage strategy and detailed design of the development proposals.

3.2.6. In summary, the risk of flooding from surface water is low and the proposals will reduce this risk both onsite and offsite.

3.3. Groundwater

3.3.1. The site is underlain by Clays, which do not allow water to easily pass through. Therefore, it is unlikely that any significant groundwater flows could affect the site. This is reflected in the 'Susceptibility to Groundwater' mapping from the SFRA, which indicates that there is no risk to the site, see Figure 4.

Figure 4: Susceptibility to groundwater mapping (SFRA extract)



3.4. Artificial sources:

3.4.1. Based on the EA's Risk of Flooding from Reservoir Breach mapping, the site is outside the maximum extent of flooding in the event of a reservoir breach. There are no nearby canals or other artificial water bodies that could affect the site. Therefore, the risk of flooding from artificial sources is low.

3.5. Summary of risk of flooding from all sources

3.5.1. A summary of the existing flood risk from all sources is provided in Table 1.

Table 1 - Summary of flood risk to the site

SOURCE OF FLOODING	RISK
Fluvial	Low
Surface Water	Low
Groundwater	Low
Artificial Sources (e.g. reservoirs, canals)	Low

4. COMPARISON WITH OTHER HELAA SITES

4.1.1. Scoring used for the Sequential Test when undertaking the HELAA assessment looked at the percentage of the site covered by Flood Zones 2 and 3 and the High, Medium, and Low surface water flood extents.

4.1.2. Assessing competing sites in this way does not take into account the actual risk of flooding (flood hazard) or whether the extents affect the developable area. In theory, the risk could be manipulated by simply redrawing the red line boundary.

4.1.3. Notwithstanding, we have undertaken a detailed comparative assessment between the Site and Slate Hall Farm for the present day and future climate change scenarios.

4.1.4. The risk of fluvial and surface water flooding has been based on the extent and probability of the flooding.

4.1.5. Scoring is weighted based on the percentage of the site area that is flooded and the likelihood of the flooding.

4.1.6. The most likely flood events have been given a higher weighting, related to the probability of that flood event occurring. Three probability events have been used in the assessment:

Table 2: Contribution weighting of probability events towards surface water flood scores

Event	Annual Probability	Event Weighting	Event Weighting
High	3.33%	$= \frac{3.33}{3.33 + 1 + 0.1} =$	0.752
Medium	1%	$= \frac{1}{3.33 + 1 + 0.1} =$	0.226
Low	0.1%	$= \frac{0.1}{3.33 + 1 + 0.1} =$	0.023

4.1.7. The percentage of flooded site area is assessed for each probability event and multiplied by the probability weighting to get the score for that event. The scores for each event are then added together to get the total flood score for that source of flooding, see worked example in Table 3.

Table 3: Worked Example - Moderate Flood Hazard Score for the Site

Event	Event Weighting	% flooded	Score
High	0.752	0.34	= 0.752 x 0.34 = 0.26
Medium	0.226	0.42	= 0.226 x 0.42 = 0.09
Low	0.023	0.67	= 0.023 x 0.67 = 0.02
		Total =	0.26 + 0.09 + 0.02 = 0.37

4.1.8. The groundwater flood maps look at the extents of the potential impacts without a defined probability of occurrence. Therefore, groundwater flood risk has been assessed based on the extents within each site boundary for the potential for groundwater flooding of property situated below ground level and potential for groundwater flooding to occur at surface.

4.1.9. A summary of the present day and future climate change outputs from this assessment are shown on Figure 5.

Figure 5: Site Comparison - Tritax Park v Slate Hall Farm)

Present Day	Scores		Normalised	
	Tritax Park	Cambridge 25	Tritax Park	Cambridge 25
Fluvial	1.96	3.44	0.57	1.00
SW - moderate	0.37	0.13	1.00	0.34
SW - significant	0.12	0.14	0.83	1.00
SW - extreme	0.00	0.00	1.00	0.25
GW - below	1.35	9.27	0.15	1.00
GW - surface	0.23	24.53	0.01	1.00

Climate Change	Scores		Normalised	
	Tritax Park	Cambridge 25	Tritax Park	Cambridge 25
Fluvial	3.41	4.33	0.79	1.00
SW - moderate	0.47	0.16	1.00	0.35
SW - significant	0.14	0.15	0.91	1.00
SW - extreme	0.00	0.00	1.00	0.47
GW - below	n/a	n/a	n/a	n/a
GW - surface	n/a	n/a	n/a	n/a

4.1.10. Based on publicly available mapping, Slate Hall Farm (Cambridge 25) is roughly 2 times more at risk of fluvial flooding and 8 - 100 times more at risk of groundwater flooding than the Site.

4.1.11. Surface water is more complicated. The Site is roughly 3 times and 4 times more likely in the present day scenario to experience surface water flooding with a moderate hazard (danger to some) and extreme flood hazard (danger to all), respectively. However, the site is less likely to experience significant flood hazard (danger to most).

4.1.12. When considering climate change, there is little change in the comparative risk of fluvial flooding or moderate or significant flood hazard from surface water. However, there is a slight reduction in the comparative risk of extreme flood hazard from surface water, with the Site 2 times more likely to be affected than Slate Hall Farm.

4.1.13. Climate change groundwater mapping is not available and therefore this has not been assessed for a future climate change scenario. However, groundwater flood risk is not expected to change significantly as a result of climate change.

4.1.14. The comparative assessment has demonstrated that the Site is less at risk of flooding than the Slate Hall Farm site due to the lower risk of fluvial and groundwater flooding and the mixed results when comparing surface water flood risk. Therefore, we would expect the Site to have a lower (or as a minimum equal) Flood Risk RAG rating as Slate Hall Farm i.e. the Site should be downgraded from Red to Green.

4.1.15. It is noted that Slate Hall Farm was not scored within the HELAA based on the area of flood extents within the site. Instead, it was qualitatively assessed based on a site-specific study carried out by MJM. The Slate Hall Farm site was classified as having an Amber Flood Risk RAG rating within the HELAA due to the areas of high fluvial and surface water risk around Oakington Brook.

4.1.16. The technical assessment of flood risk laid out in this document demonstrates that the risk of flooding from all sources is low. We acknowledge that there are areas of the site that are classified as having a high probability of flooding. However, the development will be designed so that only elements such as public open space, biodiversity and amenity areas are located in areas at risk of any source of current or future flooding, in line with the EA's standing advice for Flood Risk Assessments. Therefore, it is recommended that the Site should be classified as having a Green Flood Risk RAG rating due to the low risk of flooding from all sources.

5. CONCLUSION

5.1.1. This technical note has demonstrated that the site is not only deliverable in terms of flood risk but that it should be considered one of the best available sites due to the low risk of flooding from all sources.

5.1.2. We have demonstrated through a comparative assessment that the Site is less at risk of flooding than the Slate Hall Farm site. Therefore, we would expect the Site to have an equal or lower Flood Risk RAG rating than Slate Hall Farm .

5.1.3. The technical assessment of flood risk laid out in this document demonstrates that the risk of flooding from all sources is low. We acknowledge that there are areas of the site that are classified as having a high probability of flooding. However, the development will be designed so that only elements such as public open space, biodiversity and amenity areas are located in areas at risk of any source of current or future flooding, in line with the EA's standing advice for Flood Risk Assessments. Therefore, it is recommended that the Site should be classified as having a Green Flood Risk RAG rating due to the low risk of flooding from all sources.

5.1.4. It is our recommendation that this site is considered as a priority for inclusion within the emerging local plan.

RIDGE

www.ridge.co.uk

APPENDIX 3
LANDSCAPE MASTERPLAN

KEY

- Site Boundary
- Proposed Trees
- Proposed Attenuation
- Proposed Open Green Space
- Proposed Footpaths through Open Space
- Active Social Nodes and Immersive Restorative Nodes
- Community Zone
- Car Park
- Roads
- Warehouses and Offices
- Archaeology Zone

Rev.	Date.	Details.
A	06.01.2026	Workshop 3 Masterplan

GENERAL
Do not scale from this drawing.
All dimensions to be checked on site.
This plan is to be read with all accompanying documentation.
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TRITAX BIG BOX

Tritax Big Box Developments Limited
Grange Park Court, Roman Way, Northampton, NN4 5EA

BIDWELLS

Masterplanning, Landscape & Assessment
Bidwell House, Trumpington Road, Cambridge, CB2 9LD

TRITAX PARK, CAMBRIDGESHIRE

ILLUSTRATIVE MASTERPLAN

Bar Scale:	Job Code:	OS License Number:
NOT TO SCALE	104210	100017734

Project Phase:	Date:	Drawn By:	Checked By:
PLANNING	06.11.25	CLR	DP

Drawing Number: MLA104210-A3-0201

Revision: A

APPENDIX 4
ECOLOGY REPORT

APPLIED ECOLOGY

Tritax Park Cambridge

Ecology Report

Client: Tritax Big Box Developments

Project number: AEL2272

Date: October 2025

Document Information:

Version	Date	Version Details	Prepared by	Checked by	Approved by
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APPLIED ECOLOGY

St John's Innovation Centre
Cowley Road
Cambridge
CB4 0WS

Tel: 01223 422 116
Email: info@appliedecology.co.uk

CIEEM
REGISTERED
PRACTICE 2024-2025

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1 Introduction

Background

1.1 In April 2024, Applied Ecology (AE) was commissioned by Tritax Big Box Developments to carry out ecology baseline surveys of an area of land north of the A14 (junction 25) at Bar Hill, Cambridgeshire ("the Site"). A plan showing the location of the Site is provided in **Figure 1.1**.

1.2 The study was required in order to determine the likely ecological constraints associated with a proposal for a commercial distribution development ("the Development"). The proposed Site Layout is provided in **Appendix A**.

1.3 Where possible, the likely impacts of the Development on ecology are discussed; however, the report does not provide, and nor is it intended to provide, a detailed or comprehensive assessment of development impacts in the form of an Ecological Impact Assessment (EcIA).

Scope of Work Completed

1.4 The scope of ecology survey work has been determined based on the habitats present, their potential value for protected animal species and likely impacts associated with the Development as currently proposed. The Site comprised two sections of primarily arable farmland – in the east a series of fields around Noon Folly Farm and in the west the land around and to the east of Hill Farm.

1.5 During 2024, a number of surveys were completed first in the eastern half of the Site, before the Site boundary was expanded to include the Hill Farm land in the west. Where possible, surveys were extended to cover the entire Site boundary, but for bat activity and, to a lesser extent, breeding birds survey, the western area was subject to less or no coverage. In order to ensure the findings of the 2024 surveys were not compromised by the late change to the Site boundary, a range of additional surveys were completed during 2025 which encompassed the entire Site.

1.6 The ecology baseline surveys that have been undertaken are listed below, together with survey timings.

2024

- Review of existing information, including data provided by the Cambridge and Peterborough Environmental Records Centre (CPERC).
- Phase 1 habitat survey (undertaken 22 April 2024 in the eastern part of the Site and 28 June 2024 in the west).
- Great crested newt survey (presence/absence eDNA survey of nearby waterbodies, June 2024).
- Breeding bird survey (four visits to the eastern part of the Site, April–June 2024, with a single visit to the western part of the Site on 28 June 2024).
- Winter bird survey (three visits, December 2024–February 2025)
- Badger survey (undertaken as part of Phase 1 habitat surveys on 22 April and 28 June 2024).
- Water vole survey and otter survey (visits completed on 21 June 2024 (eastern part of Site) and 28 August 2024 (whole Site).
- Bat activity survey (three visits May–September 2024).

2025

- Breeding bird survey (three visits, April–June 2025).
- Bat activity survey (one visit, August 2025).

Legislation

1.7 The Wildlife and Countryside Act 1981 (as amended) provides the main legal framework for nature conservation and species protection in the UK. The Site of Special Scientific Interest (SSSI) is the main statutory nature conservation designation in the UK. Such sites are notable for their plants, or animals, or habitats, their geology or landforms, or a combination of these. Natural England is the key statutory agency in England for advising Government, and for acting as the Government's agent in the delivery of statutory nature conservation designations.

1.8 Designation of a SSSI is a legal process, by which sites are notified under the Wildlife and Countryside Act 1981. The 1981 Act makes provision for the protection of sites from the effects of changes in land management, and owners and occupiers receive formal notification specifying why the land is of special scientific interest and listing any operations likely to damage the special interest.

1.9 The Countryside and Rights of Way Act 2000, and The Natural Environment and Rural Communities (NERC) Act 2006, provide supplementary protected species legislation. Specific protection for badgers *Meles meles* is provided by the Protection of Badgers Act 1992.

Habitats and Species of Principal Importance in England

1.10 The Natural Environment and Rural Communities (NERC) Act came into force on 1 October 2006. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The list has been drawn up in consultation with Natural England, as required by the Act.

1.11 The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when conducting their normal functions.

Habitats of Principal Importance

1.12 Fifty-six habitats of principal importance are included on the S41 list. These are all the habitats in England that were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework. They include terrestrial habitats such as upland hay meadows to lowland mixed deciduous woodland, and freshwater and marine habitats such as ponds and sub-tidal sands and gravels.

Species of Principal Importance

1.13 There are 943 species of principal importance included on the S41 list. These are the species found in England which were identified as requiring action under the UK BAP and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework. In addition, the hen harrier *Circus cyaneus* has also been included on the list because without continued conservation action it is unlikely that the hen harrier population will increase from its current very low levels in England.

1.14 In accordance with Section 41(4) the Secretary of State will, in consultation with Natural England, keep this list under review and will publish a revised list if necessary.

National Planning Policy Framework

1.15 The National Planning Policy Framework (NPPF) was first published in March 2012 (and replaced previous planning policy guidance (PPS 9) on biodiversity). The latest revision was published in December 2024, with paragraphs 193–195 stating the following in relation to habitats and biodiversity:

"193. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

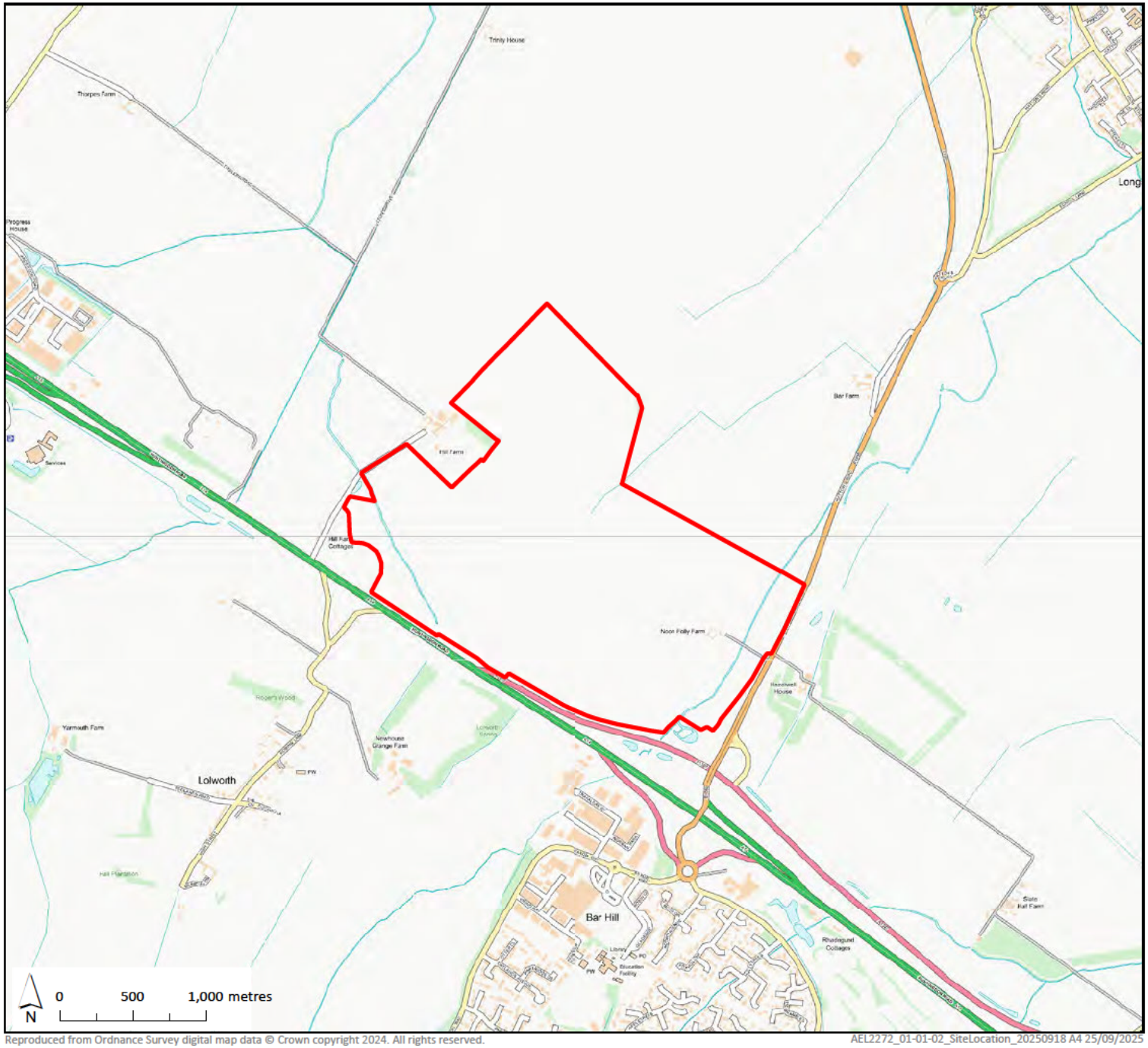
194. The following should be given the same protection as habitats sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site."



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AEL2272_01-01-02_SiteLocation_20250918 A4 25/09/2025

Tritax Park, Cambridge

Site location

Site boundary

Figure 1.1

Map Scale @ A4: 1:50,000

Surveyed by: n/a	
Survey date: n/a	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

2 Existing Information

Information Sources

2.1 The Cambridge and Peterborough Environmental Records Centre (CPERC) was commissioned to complete a search of its database for existing biological records. This included a search for records of statutory and non-statutory wildlife sites, ancient woodland, and protected and notable species both on the Site and within 2 km of the Site's central point.

2.2 Additional information of protected wildlife sites, ancient woodland and protected species was obtained from the government's MAGIC[1] online mapping tool.

Designated Wildlife Sites

2.3 The Site is not covered by any statutory wildlife site designation and does not support any ancient woodland.

2.4 The closest statutory designated site is **Overhall Grove Site of Special Scientific Interest (SSSI)**, located 3.3 km to the south-west of the Site. This is an ancient secondary woodland now dominated by small-leaved elm *Ulmus minor* and represents a woodland type which is nationally restricted in its distribution.

2.5 There are no non-statutory designated sites within 2 km of the Site, and the closest area of ancient woodland called L Grove, is located 2 km to the west.

2.6 The locations of the designated wildlife sites and ancient woodland in proximity to the Site are shown in **Figure 3.1**.

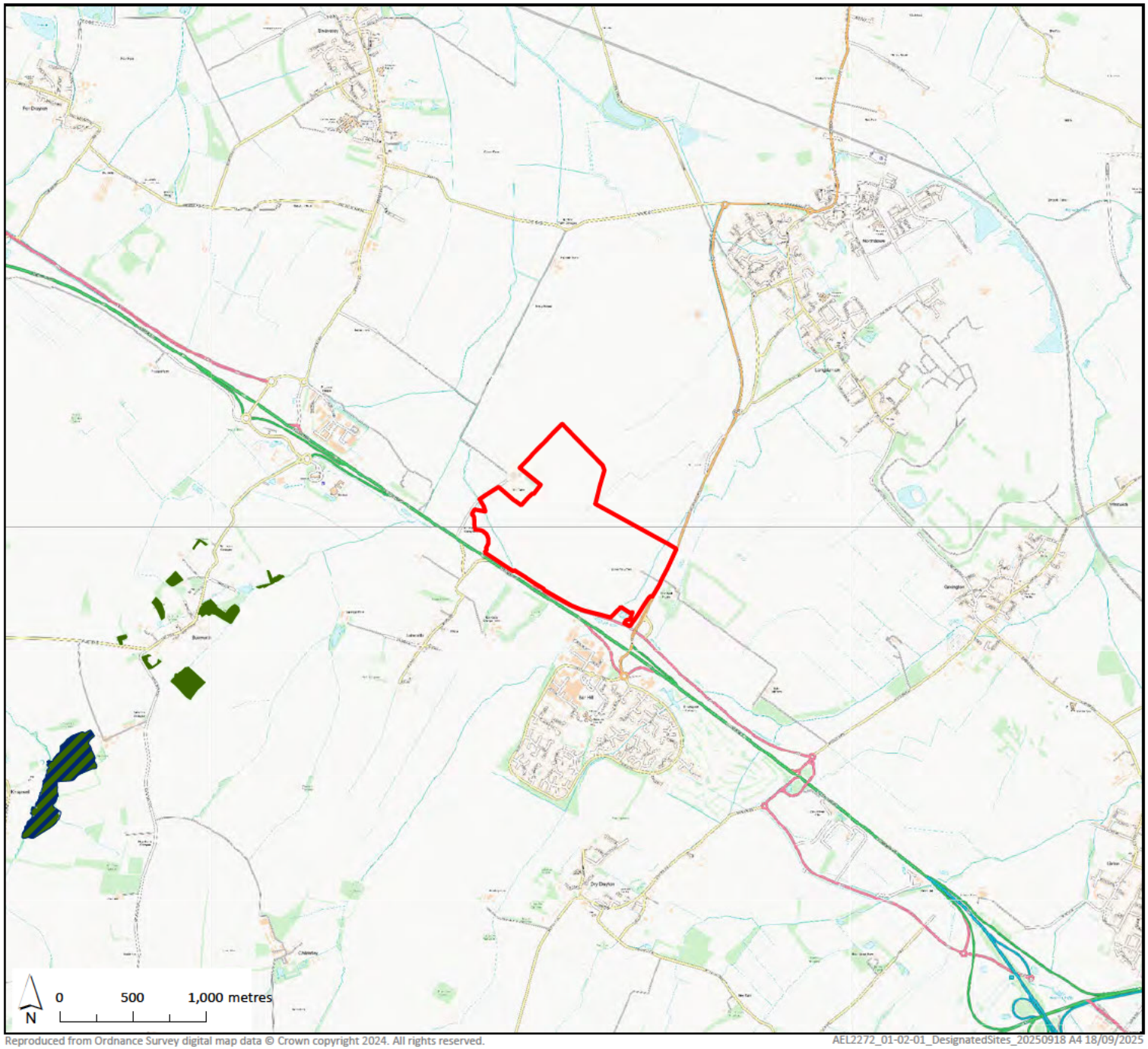
Protected and Notable Species

2.7 A total of 565 species records was returned by the data search the majority of which related to birds. The records are summarised as follows:

- Birds – 353 records of 45 species, including various red-listed farmland specialists of elevated conservation concern such as skylark *Alauda arvensis* (25 records), linnet *Linaria cannabina* (18 records), lapwing *Vanellus vanellus* (16 records), yellowhammer *Emberiza citrinella* (14 records) and grey partridge *Perdix perdix* (eight records).
- Bats – 90 records of at least eight species, many of which are likely to be results from fieldwork associated with the expansion of the A14 (64 bat activity survey records from 2012 and 2013). There were 25 records of common pipistrelle *Pipistrellus pipistrellus*, 15 of soprano pipistrelle *Pipistrellus pygmaeus* and five further unidentified pipistrelle *Pipistrellus* species. Records of rarer bats included four records of the nationally rare barbastelle *Barbastella barbastellus* from 2012–13, one of which was adjacent to the Site's southern boundary.
- Other mammals – 53 records, of which 25 related to water vole *Arvicola amphibius*, 17 were of badger, six were of otter *Lutra lutra*, four were of brown hare *Lepus europaeus* and one was of polecat *Mustela putorius*.

[1] http://www.magic.defra.gov.uk/MagicMap.aspx accessed 17/09/202.

  - Badger – many of the badger records related to road kills, including on the A14 and B1050 adjacent to the Site, but there was also a record of a single-hole sett within the Site boundary from 2005.
  - Otter – five of the records were from Longstanton Brook, a watercourse which runs through the Site. The closest of these was one 270 m to the north from 2003. None of these records was more recent than 2006.
  - Water vole – there were six records from Longstanton Brook from 2001–2011, the closest being from 230 m to the north-east of the Site in 2003.
- Herpetofauna – 19 records, of which nine related to common lizard *Zootoca vivipara*, six were of great crested newt, and there were two each of common frog *Rana temporaria* and common toad *Bufo bufo*.
  - Common lizard – the closest record was one 600 m to the east of the Site from 2013.
  - Great crested newt – four of the records were from the period 1984–88 and, along with a positive eDNA record from Lolworth in 2019, were separated from the Site by major roads; however, there was also a record from Hill Farm, Swavesey from 2014, 530 m to the north-west of the Site.
- Invertebrates – 16 records, of which ten were of moths, four were butterflies (two purple emperor *Apatura it is* and small heath *Coenonympha pamphilus*) and two were of beetles.
- Flowering plants – 34 records, including several species characteristic of calcareous grassland, such as pyramidal orchid *Anacamptis pyramidalis* and hoary plantain *Plantago media*.



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AEL2272_01-02-01_DesignatedSites_20250918 A4 18/09/2025

Tritax Park, Cambridge

Statutory designated sites and ancient woodland

- Site boundary
- Overhall Grove SSSI
- ancient semi-natural woodland

Figure 2.1

Map Scale @ A4: 1:50,000

Surveyed by: n/a	
Survey date: n/a	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

3 Habitats and Plants

Approach

3.1 A baseline habitat survey was undertaken of the eastern side of the Site on 22 April 2024, with a follow-up survey of the western side on 28 June 2024, and 2 October 2025. The surveys were completed by AE ecologist Richard Dale MCIEEM[2] in dry and bright weather conditions on both survey occasions. The methodology adopted followed the UK Habitat Classification (UKHab) system[3], adapted to encompass habitats as used by the Statutory Biodiversity Metric – the Metric habitats largely align with UKHab definitions, but differ in some cases (e.g., hedgerows).

3.2 All habitats present within the Site were classified and mapped according to standard UKHab/Metric categories and assigned a condition according to Statutory Biodiversity Metric guidance[4]. Habitat patches were mapped as polygon features, and linear features (such as hedgerows and ditches) as lines. Point features were recorded where there were notable isolated trees or scrub, and trees were assigned to size categories based on the following Metric guidance:

- Small: >7.5–≤30 cm Diameter at Breast Height (DBH);
- Medium: >30–≤60 cm DBH;
- Large >60–≤90 cm DBH;
- Very large: >90 cm DBH.

3.3 Plant species abundance was noted using the DAFOR[5] system; the plant species list from the Site visit is shown in **Appendix B.**

3.4 The habitat map was subsequently digitised using a Geographical Information System (ArcGIS Pro) and presented using a bespoke symbology rather than that used by UKHab, as this does not allow for all Metric habitat types or habitat conditions.

3.5 The survey was completed within the accepted season for completing habitat survey (which runs from late March until mid-October in southern England).

Results

3.6 The baseline habitat map is shown in **Figure 3.1**. A summary of the habitats recorded is provided in **Table 3.1** below, and target notes can be found in **Appendix B**. A selection of habitat survey photographs can be found in **Figure 3.2**.

3.7 In summary, the Site comprised an open expanse of mostly arable farmland immediately adjacent to the A14, with two fields of improved grassland in the east, a number of farm buildings, and a shallow watercourse called Longstanton Brook running through the Site.

[2] Level 4 Botanical Society of Britain and Ireland (BSBI) Field Identification Skills Certificate.
[3] UKHab Ltd (2023) *UK Habitat Classification Version 2.0* (at https://www.ukhab.org).
[4] Available from Statutory biodiversity metric tools and guides - GOV.UK (www.gov.uk) Accessed on 18/02/2025.
[5] DAFOR: whereby species occurrence may be classified as being **d**ominant, **a**bundant, **f**requent, **o**ccasional, or **r**are. Rare in the context of a DAFOR score should not be confused with species rarity in the more widely accepted meaning of general scarcity.

Cropland: Cereal crops

3.8 The majority of the Site comprised arable farmland. The eastern half of the Site around Noon Folly Farm was cereal stubble at the time of survey and was subsequently sown with a barley crop. The western area around around Hill Farm supported winter-sown wheat and oilseed rape crops.

3.9 A small field at the westernmost point of the Site was fallow, and arable weeds present included extensive bristly oxtongue *Picris echioides*.

Grassland: Modified grassland

3.10 Two fields in the eastern part of the Site comprised apparently recently sown improved grassland. To the north of the access track this was dominated by Italian rye-grass *Lolium multiflorum*, with abundant bristly oxtongue *Picris echioides*, and frequent black grass *Alopecurus myosuroides*, meadow foxtail *Alopecurus pratensis* and oat *Avena sativa*. The species diversity per m^2 was low, averaging 5.4 species from five quadrats (range = 4–7 species).

3.11 To the south of the access track, the sward was dominated by soft brome *Bromus hordeaceus*, with abundant black grass and bristly oxtongue, and frequent cock's-foot *Dactylis glomerata*, meadow foxtail, red fescue *Festuca rubra* and creeping bent *Agrostis stolonifera*. The species diversity per m^2 was 5.8 species from five quadrats (range = 5–7 species).

3.12 A small field of grassland south-east of the Noon Folly Farm buildings supported very few forbs, comprising mostly Italian rye-grass, soft brome, cock's-foot, meadow foxtail and barren brome, with a species diversity of 4.25 species per m^2 (range = 3–5) from four quadrats.

3.13 A field in the west of the Site comprised intensively grazed improved grassland (by sheep, though none were present at the time of survey). This was dominated by perennial rye-grass, with Yorkshire-fog *Holcus lanatus* and crested dog's-tail *Cynosurus cristatus*, and very few forbs. The species diversity was very low at 3.7 species from three quadrats (range = 3–4 species).

3.14 Narrow field margins to arable fields in the western part of the Site showed minor variations in structure and species composition, with the tallest sward along the ditch which marked the boundary between the two halves of the Site. Overall, these areas were characterised by abundant cock's-foot and soft brome, with frequent false oat-grass, barren brome *Anisantha sterilis*, common couch, red fescue, smooth meadow-grass and meadow foxtail, with frequent tall ruderal species such as cow parsley, cleavers *Galium aparine*, common nettle *Urtica dioica*, curled dock *Rumex crispus* and clustered dock *Rumex conglomeratus* indicative of nutrient enrichment. Species diversity here averaged 4.75 species per m^2 from four quadrats (range = 4–7).

3.15 Sparse, probably recently established, grassland was present in the south of the Site. No species dominated, but soft brome, barren brome, cock's-foot, false oat-grass, bristly oxtongue, thyme-leaved speedwell *Veronica serpyllifolia* and common cat's-ear *Hypochaeris radicata* were frequent. The species diversity was low, an average of 5.25 species per m^2 was recorded from four quadrats (range = 4–7), although where the grassland approached Longstanton Brook diversity increased, with species such as oxeye daisy *Leucanthemum vulgare* and smooth tare *Vicia tetrasperma* more frequent.

3.16 An amenity grassland lawn was present Noon Folly Farm in the east of the Site, dominated by perennial rye-grass with frequent daisy *Bellis perennis*, with a species diversity of 3.5 species per m^2 from two quadrats (range = 3–4).

Grassland: Other neutral grassland

3.17 Various arable margins, ditch banks and other peripheral areas at the Site supported relatively species-poor semi-improved neutral grassland.

3.18 A strip either side of the watercourse (Longstanton Brook) that ran through the eastern part of the Site supported abundant meadow foxtail *Alopecurus pratensis* and frequent cock's-foot, false oat-grass *Arrhenatherum elatius*, common couch *Elytrigia repens*, smooth meadow-grass *Poa pratensis*, tor-grass *Brachypodium pinnatum*, false brome *Brachypodium sylvaticum*, lesser celandine *Ficaria verna* and meadow vetchling *Lathyrus pratensis*. A wide range of other species were present, including hedge bedstraw *Galium mollugo*, cow parsley *Anthriscus sylvestris* and white dead-nettle *Lamium album*, but overall, the species diversity per m^2 was low, averaging 7.4 species from five quadrats (range = 6–9 species).

3.19 A strip of grassland along a roadside ditch formed the Site's eastern boundary to the north of the access track, and contained abundant bramble scrub, as well as blackthorn *Prunus spinosa* and occasional hawthorn *Crataegus monogyna*, and frequent tall ruderal species. Species diversity was 6.5 species per m^2 (range = 5–9) from four quadrats.

3.20 Areas of grassland along the southern boundary of the Site was more diverse than that elsewhere and showed signs of being relatively recently sown in associated with the recent A14 improvements – coverage of grasses was relatively sparse, but included meadow foxtail, red fescue *Festuca rubra*, crested dog's-tail and tall fescue *Festuca arundinacea*, but forbs were dominant, including abundant oxeye daisy and slender tare *Vicia parviflora*. Other species included bird's-foot trefoil *Lotus corniculatus* and selfheal *Prunella vulgaris*, while in the east of the Site in proximity to an off-site waterbody there was abundant yellow rattle *Rhinanthus minor* and the presence tor-grass and yellow oat-grass *Trisetum flavescens* was indicative of somewhat calcareous soil. The species diversity was generally relatively high, at 10.8 species per m^2 from five quadrats (range = 9–12).

3.21 Recently planted saplings were present, in tree guards, throughout much of this grassland along the southern boundary, including hawthorn *Crataegus monogyna*, hazel *Corylus avellana*, dogwood *Cornus sanguinea*, blackthorn *Prunus spinosa* and pedunculate oak *Quercus robur*.

Sparsely vegetated land: Tall forbs

3.22 Small areas around Noon Folly Farm were heavily dominated by tall ruderal species, particularly common nettle, cow parsley and hogweed.

Urban: Developed land; sealed surface

3.23 These habitat types were present primarily around the farm itself, as well as a farm track that ran through the Site.

Woodland and forest: Other woodland; broadleaved

3.24 A small stand of broadleaved plantation woodland was present on the northern boundary in the western part of the Site. This was almost exclusively a stand of elm *Ulmus* spp., with a dense ground layer of cow parsley and cleavers.

Lakes: Ponds (non-priority habitat)

3.25 A balancing pond in proximity to the A4 in the west of the Site held common reed common reed *Phragmites australis*, bulrush *Typha latifolia*, water plantain *Alisma plantago-aquatica*, and jointed

rush *Juncus articulatus*, with great willowherb *Epilobium hirsutum* and hard rush *Juncus inflexus* on the banks.

Individual trees: Rural tree

3.26 Individual ash *Fraxinus excelsior*, weeping willow *Salix babylonica* and lime *Tilia* sp. trees were present along the watercourse in the eastern part of the Site and three ash trees were present on the northern part of the western boundary. Trees within the curtilage of the garden at Noon Folly Farm were semi-mature Norway spruce *Picea abies* and horse chestnut *Aesculus hippocastanum*, and a small apple *Malus domestica*.

3.27 In the west of the Site there was a large pedunculate oak on the western boundary and a handful of other individual trees, including crack willow *Salix fragilis* and horse chestnut.

Heathland and shrub: Mixed scrub.

3.28 A small patch of dense, mostly blackthorn scrub was present along the central drainage ditch.

3.29 Scattered scrub, mostly comprising bramble *Rubus fruticosus*, was present in several marginal areas, particularly along the drainage ditches on the northern and eastern boundaries

Hedgerows

Native hedgerow with trees

3.30 A species-poor hedge with trees was present on the western bank of a section of Longstanton Brook. This was dominated by hawthorn, with abundant bramble and occasional elder *Sambucus nigra*. Several mature willow *Salix* spp. and ash trees were present.

3.31 A species-poor hedge with trees was present in the south of the Site, on the western bank of a ditch. This comprised hawthorn with ash, horse chestnut, alder *Alnus glutinosa* and pedunculate oak trees.

Native hedgerow

3.32 Species-poor intact hedges of hawthorn, elder, dog rose *Rosa canina* and *Prunus* spp. formed the boundaries of the farm garden.

3.33 Various hedgerows in the west of the Site were species-poor and heavily managed, typically dominated by hawthorn.

Line of trees

3.34 A line of ash trees, many of which shows extensive signs of dieback, was present alongside a ditch in the west of the Site.

Ditches and flowing water

3.35 Longstanton Brook comprised a narrow, shallow flowing watercourse that ran though the eastern part of the Site. It had steep banks and variable marginal and in-channel vegetation including fool's watercress *Apium nodiflorum*, meadowsweet *Filipendula ulmaria*, yellow iris *Iris pseudacorus*, curled pondweed *Potamogaton crispus* and common water-starwort *Callitriche stagnalis*.

3.36 A drainage ditch that formed much of the Site's eastern boundary and fed into Longstanton Brook held shallow water for much of its length at the time of the survey but was dry by June (and by April in 2025). The vegetation here was not indicative of permanently wet conditions and it is likely that this ditch is dry for the majority of the year in most years. Species present included great willowherb, meadowsweet and common spike-rush *Eleocharis palustris*.

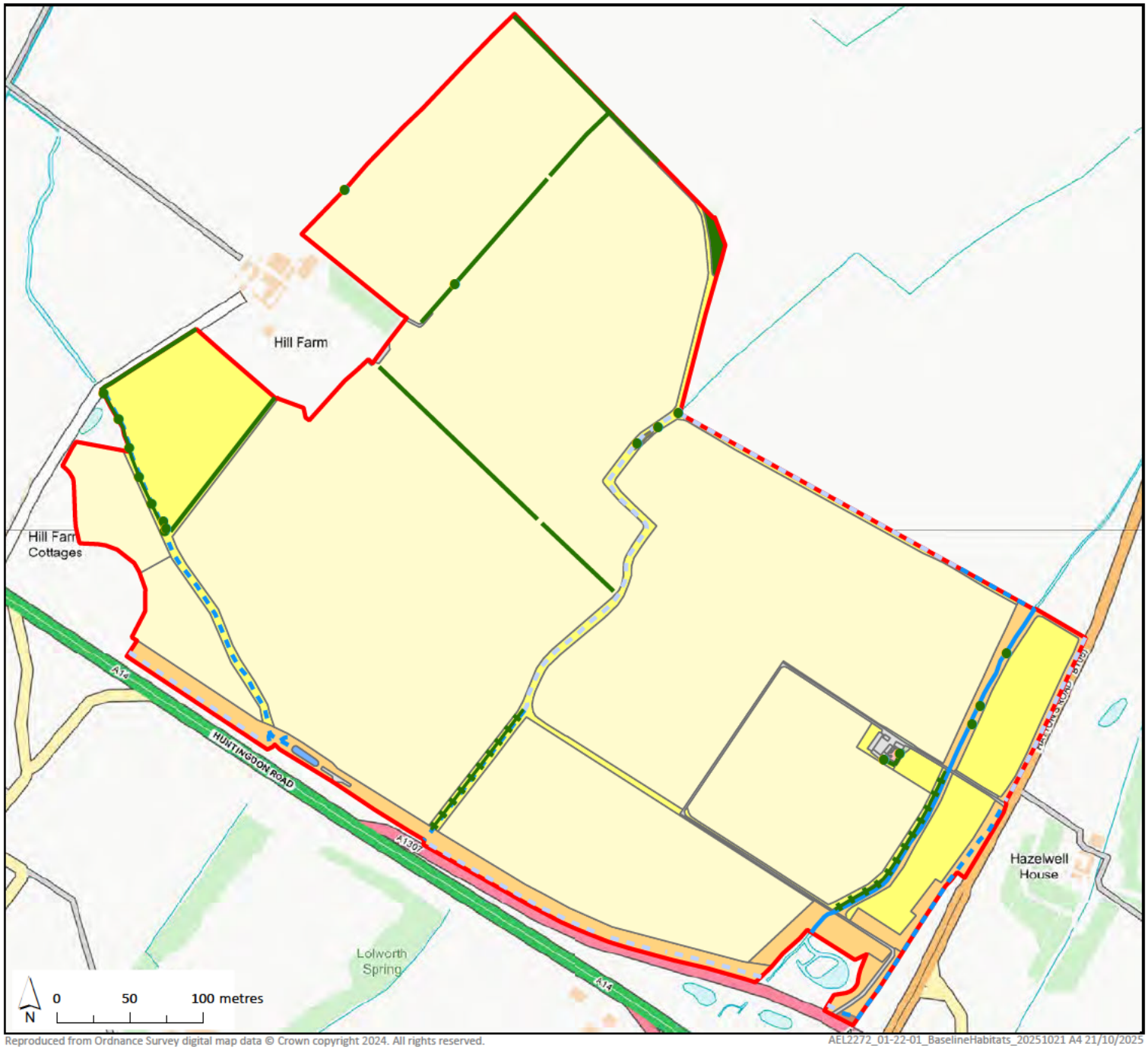
3.37 A ditch which ran along the Site's eastern boundary held some water at the time of survey but is likely to be only ephemerally wet. This was heavily overgrown with vegetation to the north of the access track but much more open to the south and supported species such as hard rush, great willowherb, bulrush and, to the north, extensive bramble.

3.38 A predominantly dry ditch bisected the eastern and western halves of the Site, and supported little in-channel vegetation, but marginal species included occasional water figwort *Scrophularia auriculata*.

3.39 A ditch in the southern part of the western area held shallow water at the time of survey, with extensive fool's watercress *Apium nodiflorum* along the western part of its length, and common reed towards the eastern end, where it fed into a balancing pond alongside the A14. This ditch was mostly dry when inspected in late August.

Table 3.1: Summary of habitat types recorded on the Site.

Habitat	Area (ha)	% of Site
Cropland: cereal crops	102.954	83.9
Grassland: modified grassland	12.479	10.2
Grassland: other neutral grassland	4.838	3.9
Urban: developed land; sealed surface	0.537	0.4
Woodland and forest: other woodland; broadleaved	0.169	0.1
Sparsely vegetated land: tall forbs	0.077	0.1
Lakes: ponds (non-priority habitat)	0.047	<0.1
Urban: vegetated garden	0.029	<0.1
Heathland and shrub: mixed scrub	0.024	<0.1
Land not surveyed	1.585	1.3



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AEL2272_01-22-01_BaselineHabitats_20251021 A4 21/10/2025

Tritax Park, Cambridge

Baseline habitat map

- Site boundary
- Grassland: other neutral grassland
- Woodland and forest: other woodland; broadleaved
- Heathland and shrub: mixed scrub
- Lakes: ponds (non-priority habitat)
- Grassland: modified grassland
- Sparsely vegetated land: tall forbs
- Sparsely vegetated land: ruderal/ephemeral
- Cropland: cereal crops
- Urban: vegetated garden
- Urban: developed land; sealed surface
- Dry ditch
- Ephemerally wet ditch
- Flowing watercourse
- Line of trees
- Native hedgerow
- Native hedgerow with trees
- Individual tree (indicative location)

Figure 3.1

Map Scale @ A4: 1:5,500

Surveyed by: RD	
Survey date: April-June 2024, Oct 2025	
Drawn by: DB	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

Figure 3.2: Selection of habitat survey photographs.

a) Longstanton Brook and adjacent semi-improved grassland and hedgerow with trees in eastern part of the Site.

b) Improved grassland field to north of access track in east of the Site.

c) Arable field with arrow grassland field margins and scattered scrub and trees along ditch on western boundary.

d) Overgrown ditch along eastern Site boundary.

e) Species-poor intact hedge, oilseed rape and barley crops, and very narrow field margins in west of Site.

f) Stand of elm-dominated plantation woodland on northern boundary

g) Semi-improved natural grassland along southern boundary.

g) Balancing pond adjacent to A14 in the south of the Site.

h) Large barn with barn owl box at Noon Folly Farm.

i) Residential dwelling and outbuildings at Noon Folly Farm.

j) Open, intensively managed arable landscape with negligible field margins typical of the majority of the Site.

k) Water vole burrow in the bank of Longstanton Brook.

4 Fauna

Great Crested Newt

Approach

4.1 In advance of the survey the 1:25,000 scale Ordnance Survey map was checked and online aerial photos inspected to identify any ponds within 250 m of the Site that could potentially support breeding populations of the legally protected amphibian great crested newt *Triturus cristatus* (GCN).

4.2 Ponds within the Site and within 250 m of the Site that were not separated from the Site by significant barriers to GCN dispersal (i.e. major roads), were subject to GCN presence /absence (eDNA) survey using ADAS test kits and survey protocols on 21 June (Ponds 1, 2 and 13) and 24 June 2024 (Ponds 14 and 15) by a licenced GCN surveyor from AEL.

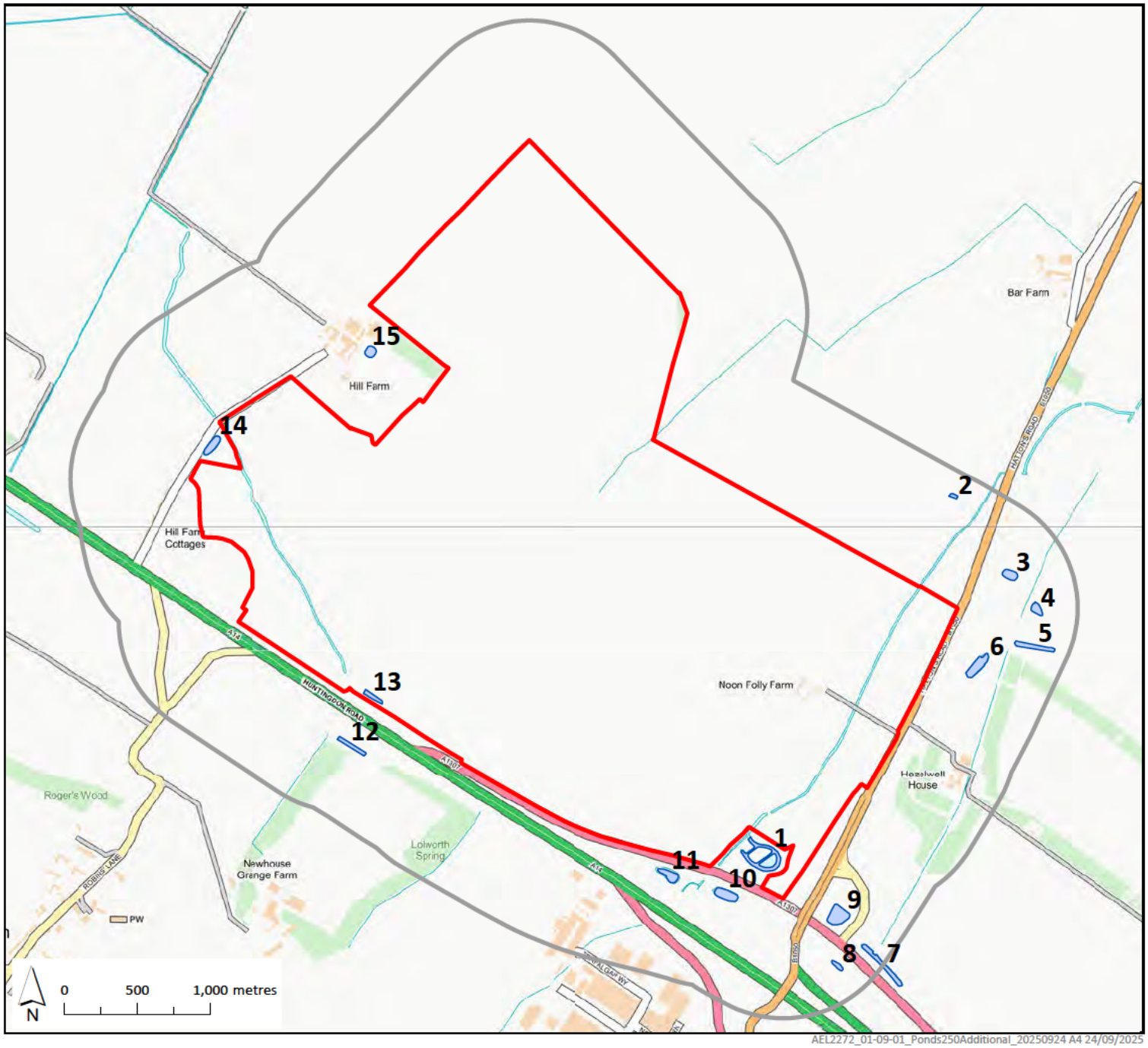
Findings

4.3 There were 15 waterbodies within 250 m of the Site boundary, including one pond within the Site (Pond 13), as shown by **Figure 4.1**. The majority of these were separated from the Site by major barriers to GCN dispersal in the form of major roads (the A14, A1304 and B1050); however, five were not separated by any major dispersal barrier – Ponds 1, 2, 13, 14 and 15 and were surveyed.

4.4 Pond 1 was a series of channels directly connected to the Longstanton Brook, rather than an isolated pond.

4.5 Most of these waterbodies (all but Ponds 2 and 15) appeared to have been recently created during the A14 widening over the period 2016–20.

4.6 All five ponds subject to eDNA survey were found to be negative for GCN. As such, the species can be considered likely absent from aquatic and terrestrial habitats within the Site.



AEL2272_01-09-01_Ponds250Additional_20250924 A4 24/09/2025

Tritax Park, Cambridge

Waterbodies within 250 m

- Site boundary
- 250 m from Site boundary
- waterbodies within 250 m

Figure 4.1

Map Scale @ A4: 1:50,000

Surveyed by: n/a	
Survey date: n/a	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

Birds

Breeding Survey Approach

2024

4.7 A four-visit transect-based territory mapping breeding bird survey was completed over the period April–June 2024 by Richard Dale MCIEEM. The survey combined aspects of the Breeding Birds Survey (BBS) and Common Bird Census (CBC)[6] and was informed by best practice guidance published by the Bird Survey and Assessment Steering Group.[7] In this instance, four visits were completed, rather than six, as the habitats at the Site were largely uniform arable farmland with few hedgerows, and there was limited scope for a particularly diverse breeding bird assemblage to be present. As such, four visits were considered adequate to accurately assess the diversity and distribution present.

4.8 The eastern part of the Site, east of the central drainage ditch, was subject to all four survey visits. The remaining western part of the Site, however, was only subject to the final visit, on 28 June 2024.

4.9 The survey visits took place on 22 April, 14 May, 30 May and 28 June 2024 during generally fine and dry weather conditions. Each transect survey started within an hour of sunrise to coincide with the peak period of bird activity and took up to two hours to complete, with the exception of the 28 June visit, which also encompassed the western part of the Site, and took around four hours to complete.

4.10 A transect route was devised to adequately cover all accessible parts of the Site as shown by **Figure 4.2**.

4.11 During each survey, the positions, age, sex, and behaviour of individual birds were recorded on large-scale field maps with a new map used on each visit. Depending on the behaviour observed, species were allocated levels of breeding confirmation using slightly adapted BTO guidelines[8] as summarised in **Table 4.1**.

4.12 All adult birds detected by sight and/or sound were recorded, although species flying over the Site were omitted unless it was clear the birds were feeding over the Site or were flying to or had originated on or near the Site. Every effort was made to ensure that individual birds were only recorded once, and where possible, repeated records and clusters of registrations were used to map approximate breeding territories and assess species breeding density and abundance.

4.13 Notes of any nocturnal species or other notable birds were also made during dusk bat activity surveys of the Site completed on 28 May, 17 June and 27 June 2024.

2025

4.14 A three-visit bird survey, using the same methodology outlined above, was completed during the latter part of the 2025 breeding season to augment the results of the 2024 survey. The survey visits took place on 20 June, 30 June and 7 July 2025. This survey period was focussed on the peak period of activity for a range of red-listed farmland specialists, many of which (e.g. corn bunting) breed relatively late in the season.

[6] Gilbert, G., Gibbons, D.W. & Evans, J. (1998). *Bird Monitoring Methods: a manual of techniques for key UK species*. RSPB, Sandy.
[7] www.birdsurveyguidelines.org - accessed 27/02/2022.
[8] www.bto.org/volunteer-surveys/birdatlas/methods/breeding-evidence

Table 4.1: Breeding status of bird species and evidence.

Breeding status	Breeding evidence
Non-breeder	• Suspected to be on migration. • Summering non-breeder. • Not nesting within Site boundary (but potentially close by).
Possible breeding	• Species observed in suitable nesting habitat or singing male present.
Probable breeding	• Pair in suitable breeding habitat. • Permanent territory presumed through registration of territorial behaviour (song etc.) on at least two different days a week or more apart at the same place or many individuals on one day. • Courtship and display. • Visiting probable nest site. • Agitated behaviour or anxiety calls from adults, suggesting presence of nest or young nearby. • Nest-building or excavating nest-hole.
Confirmed breeding	• Distraction display of feigning injury. • Used nest of eggshells found (occupied or laid during period of survey). • Recently fledged young (nidicolous species) or downy young (nidifugous species) • Adults entering or leaving nest site in circumstances indicating occupied nest, or adults seen incubating. • Adult carrying faecal sac or food for young. • Nest containing eggs. • Nest with young seen or heard.

Wintering Bird Survey Approach

4.15 A three-visit winter birds survey was completed over the period December 2024–February 2025 by Richard Dale MCIEEM. A transect route was devised and walked around the Site to adequately cover all accessible parts of the Site, as shown in **Figure 4.2**.

4.16 Survey visits took place on 18 December 2024, 23 January 2025 and 21 February 2025 during generally fine and dry weather conditions. Each transect survey started within an hour of sunrise to coincide with the peak period of bird activity and took up to three hours to complete.

4.17 During each survey, the positions and, where relevant, age, sex and behaviour of individual birds were recorded on large-scale field maps, using a new map on each visit. Birds detected by sight and sound were recorded, however, species flying over the Site were not transcribed onto the field map unless it was clear the birds were feeding over the Site or were flying to or had originated on or near the Site. Every effort was made, using the surveyor's judgement and the survey recording methodology, to record any individual bird once only.

4.18 The survey was not intended to record all birds at the Site, rather the focus was on notable gatherings of key species, particularly those of elevated conservation concern, that might indicate the Site had elevated value for wintering bird species. Such species groups included:

- Waders – arable land can support large roosting or foraging flocks, particularly of golden plover *Pluvialis apricaria* and the red-listed lapwing.

- Thrushes – large flocks of winter thrushes, principally redwing *Turdus iliacus* and fieldfare *Turdus pilaris*.
- Finches and buntings – large mixed flocks of these species, often including red-listed species such as linnet, yellowhammer and corn bunting *Emberiza calandra*, can be attracted to areas of winter stubble or game cover.
- Other red-listed farmland specialists or notable species – species such as grey partridge and skylark, or raptors, owls, wildfowl, etc.

Breeding Bird Survey Findings

4.19 The findings of the bird survey are summarised in **Table 4.2**. This shows the species recorded, the maximum count recorded estimated number of territories for each species in each year, and the likely breeding status for each species.

4.20 A total of 37 species were recorded over the course of the two seasons' surveys – 34 in 2024 and 33 in 2025. Of these, seven were red-listed species of elevated conservation concern (greenfinch *Chloris chloris*, grey partridge, linnet, skylark, starling *Sturnus vulgaris*, corn bunting and yellowhammer) and a further ten were amber-listed (kestrel *Falco tinnunculus*, moorhen *Gallinula chloropus*, reed bunting *Emberiza schoeniclus*, rook *Corvus frugilegus*, snipe *Gallinago gallinago*, stock dove *Columba oenas*, whitethroat *Sylvia communis*, willow warbler *Phylloscopus trochilus*, woodpigeon *Columba palumbus* and wren *Troglodytes troglodytes*). The remainder were green-listed species that are not currently subject to significant trends of moderate or severe decline (note also that several of the amber-listed species, namely woodpigeon, wren, stock dove and rook, are listed as such because of the large size and importance of their British population in a European context, rather than because of breeding population declines).

4.21 Of the 37 species recorded, 14 were confirmed as breeding within the Site in at least one year, 14 were probable breeders and six were possible breeders. Three species were recorded that definitely did not breed at the Site in either year, and ten species were present in only one of the two years. A small number of additional species were observed flying overhead but had no obvious relationship with the Site and have not, therefore, been included in the species count. These were greylag goose *Anser anser*, lesser black-backed gull *Larus fuscus*, black-headed gull *Chroicocephalus ridibundus*, cormorant *Phalacrocorax carbo* and swift *Apus apus*.

Table 4.2: Birds recorded during breeding birds survey and estimated breeding populations.

Species	UK BoCC & Schedule 1 status	Max. count (and estimated territories / pairs) 2024	Max. count (and estimated territories / pairs) 2025	Breeding status, 2024–25	Notes on occurrence of red/amber-listed BoCCs and Schedule 1 species
Barn owl *Tyto alba*	Green & Schedule 1	0 (0)	1 (1)	Confirmed	Not recorded in 2024, but a pair bred successfully in a nest box at Noon Folly Farm in 2025.
Blackbird *Turdus merula*	Green	1 (1–2)	3 (1–2)	Probable	
Blackcap *Sylvia atricapilla*	Green	1 (1)	0 (0–1)	Probable	
Blue tit *Cyanistes caeruleus*	Green	3 (1–2)	4 (1–2)	Probable	
Buzzard *Buteo buteo*	Green	2 (1)	1 (1)	Probable	

Species	UK BoCC & Schedule 1 status	Max. count (and estimated territories / pairs) 2024	Max. count (and estimated territories / pairs) 2025	Breeding status, 2024–25	Notes on occurrence of red/amber-listed BoCCs and Schedule 1 species
Carrion crow *Corvus corone*	Green	3 (1–2)	2 (1–2)	Confirmed	
Corn bunting *Emberiza calandra*	Red	0 (0)	2 (1)	Probable	A single occupied territory on the northern boundary of the eastern part of the Site in 2025.
Dunnock *Prunella modularis*	Green	1 (1)	2 (1–2)	Probable	
Feral pigeon *Columba livia*	Green	2 (1)	19 (0–1)	Probable	
Goldfinch *Carduelis carduelis*	Green	1 (0–1)	10 (1–3)	Probable	
Great tit *Parus major*	Green	4 (1–2)	2 (1–2)	Probable	
Green woodpecker *Picus viridis*	Green	1 (0–1)	0 (0–1)	Possible	
Greenfinch *Chloris chloris*	Red	4 (0–2)	2 (0–1)	Confirmed	A small group was present on 28 June 2024 and breeding was confirmed in 2025.
Grey partridge *Perdix perdix*	Red	4 (1–2)	2 (1–2)	Probable	Two pairs were present on 28 April 2024 and may have bred.
Jackdaw *Corvus monedula*	Green	2 (1–2)	6 (1–2)	Possible	
Kestrel *Falco tinnunculus*	Amber	1 (0–1)	1 (0–1)	Possible	Single birds several visits.
Lesser whitethroat *Sylvia curruca*	Green	1 (0–1)	0 (0–1)	Possible	
Linnet *Linaria cannabina*	Red	4 (0–3)	9 (2–5)	Confirmed	Small numbers present on several visits, and breeding confirmed in 2025. A highly mobile, colonial nesting species.
Magpie *Pica pica*	Green	3 (1–2)	2 (1–2)	Confirmed	
Marsh harrier *Circus aeruginosus*	Green & Schedule 1	1 (0)	0 (0)	Non-breeder	A single hunting bird on 14 May 2024.
Moorhen *Gallinula chloropus*	Amber	1 (0–1)	1 (0–1)	Possible	A single bird seen on the balancing pond in the western part of the Site in both years.
Pheasant *Phasianus colchicus*	Green	2 (0–2)	3 (0–2)	Possible	
Pied wagtail *Motacilla alba*	Green	3 (1–2)	3 (1–2)	Confirmed	
Red-legged partridge *Alectoris rufa*	Green	2 (0–1)	2 (0–1)	Probable	
Reed bunting *Emberiza schoeniclus*	Amber	2 (1–2)	2 (1–2)	Confirmed	Up to two pairs present in vegetation along wetter ditches, including a confirmed breeding attempt just outside the Site

Species	UK BoCC & Schedule 1 status	Max. count (and estimated territories / pairs) 2024	Max. count (and estimated territories / pairs) 2025	Breeding status, 2024–25	Notes on occurrence of red/amber-listed BoCCs and Schedule 1 species
					boundary along Longstanton Brook in 2024.
Robin *Erithacus rubecula*	Green	1 (1)	3 (1–2)	Probable	
Rook *Corvus frugilegus*	Amber	9 (0)	0 (0)	Non-breeder	Common species, but no rookery present at he Site.
Skylark *Alauda arvensis*	Red	21 (13–15)	17 (11–13)	Confirmed	Common breeder, with territories at a much higher density in the east part of the Site in both years due to crop types present.
Snipe *Gallinago gallinago*	Amber	1 (0)	0 (0)	Non-breeder	A single bird flushed in 2024 – a passage migrant that did not breed at the Site.
Starling *Sturnus vulgaris*	Red	1 (1–2)	8 (1–2)	Confirmed	A pair bred in a tree hole in the east of the Site in both years. Flocks comprising family parties foraging in grassland in the west in 2025.
Stock dove *Columba oenas*	Amber	2 (1)	10 (0–1)	Confirmed	A pair bested in a barn owl nest box at Noon Folly Farm in 2024. Feeding flocks present in harvested fields in 2025.
Swallow *Hirundo rustica*	Green	7 (1)	0 (0)	Confirmed	
Whitethroat *Sylvia communis*	Amber	4 (4–5)	6 (5–6)	Confirmed	Up to six pairs present, in hedgerows, tall ruderal and scattered scrub.
Willow warbler *Phylloscopus trochilus*	Amber	0 (0)	1 (1)	Probable	A single territory in 2025 only.
Woodpigeon *Columba palumbus*	Amber	10 (2–4)	124 (2–4)	Confirmed	Common species, nesting in larger hedgerows. Very large feeding flocks in harvested fields in 2025.
Wren *Troglodytes troglodytes*	Amber	5 (5–8)	8 (5–8)	Confirmed	Common species, present wherever sufficient vegetation occurs – mostly denser hedgerows.
Yellowhammer *Emberiza citrinella*	Red	5 (2–4)	10 (3–5)	Probable	Present at low density, breeding in hedgerows.

Species assemblage

4.22 The species recorded from the Site represent a relatively typical and expected bird assemblage for an arable dominated site of this size in lowland England. Five specialist farmland species were recorded, namely grey partridge, skylark, linnet, corn bunting and yellowhammer, of which skylark was by far the most numerous species present. This was expected, as the Site was open, with large field sizes and few hedgerows – ample opportunity for ground-nesting species, but more limited opportunities for species reliant on hedgerows. The absence of corn bunting in 2024 was surprising, as this is a species of open farmland and not dependent on hedgerows for nesting, but a single

territory was present on the edge of the Site in 2025. Although subject to significant recent declines, it remains relatively common in on farmland in much of Cambridgeshire.

4.23 No nocturnal species were recorded during any of the bat surveys at the Site, and there was no evidence of barn owl *Tyto alba* using the nest box within one of the barns at Noon Folly Farm in 2024. In 2025, however, a pair of barn owls nested and successfully raised young at Noon Folly Farm (the presence of fledged young was confirmed by the occupant of the residential dwelling at the farm).

Bird density and distribution

4.24 The relative density of all birds recorded (excluding large post-breeding feeding flocks of gregarious species such as woodpigeon *Columba palumbus* and starling) within the Site during during the 2025 survey is shown in **Figure 4.3**. The highest density of birds was associated with the farm buildings and garden at Noon Folly Farm and the established hedgerows along Longstanton Brook in the east of the Site. Across the majority of the Site – i.e., the open arable fields, the bird density recorded was very low.

4.25 There was a marked contrast between the eastern and western parts of the Site in terms of skylark numbers in both years. In 2024, nine of the 13 confirmed territories were in the eastern area, at a much higher density than recorded in the west, see **Figure 4.4**. This was likely due to the crops present – the east was under a spring sown barley crop that has been sown directly into the winter stubble and was, judging by the sparse coverage of the crop and frequent arable weeds, not subject to particularly intensive agricultural management. This presented a highly favourable habitat for skylark, and the species' high breeding density reflected this. By contrast, the western area supported winter-sown cereals and a field of winter-sown oilseed rape. The former was used by skylarks at low density, while the rape field did not support any, most likely due to the height and density of the crop through the peak breeding season. This pattern was repeated in 2025, when 12 confirmed territories were recorded. Although the density in the east was slightly lower than in 2024, in a winter-sown wheat crop, only four territories were present in the winter-sown oilseed rape and barley in the western part of the Site.

4.26 The number of skylark territories (and those of other farmland specialist species) at the Site is likely to fluctuate according to the type of crops sown and intensity of management in any given year.

Wintering Bird Survey Findings

4.27 The survey recorded a total of 26 bird species using the Site. These are summarised in **Table 4.3** (species recorded as present but not counted are marked with an 'x').

Table 4.3: Birds recorded during breeding birds survey and estimated breeding populations.

Species	UK BoCC & Schedule 1 status	Count			Maximum count	Notes of key species
		23 Dec	18 Jan	20 Feb		
Blackbird *Turdus merula*	Green	x	x	x	x	
Blue tit *Cyanistes caeruleus*	Green	x	x	x	x	
Buzzard *Buteo buteo*	Green	1	–	1	1	
Carrion crow *Corvus corone*	Green	x	x	x	x	
Dunnock *Prunella modularis*	Amber	x	x	x	x	Common resident.
Feral pigeon *Columba livia*	Green	x	x	x	x	

Species	UK BoCC & Schedule 1 status	Count			Maximum count	Notes of key species
		23 Dec	18 Jan	20 Feb		
Fieldfare *Turdus pilaris*	Red*	–	6	–	6	Small flock in arable stubble in west of Site.
Goldfinch *Carduelis carduelis*	Green	2	–	4	4	
Great tit *Parus major*	Green	x	x	x	x	
Jackdaw *Corvus monedula*	Green	x	x	x	x	
Kestrel *Falco tinnunculus*	Amber	–	1	1	1	In January and February seen hunting grassland areas in the east of the Site.
Lapwing *Vanellus vanellus*	Red	–	–	420	420	Large flock roosting in recently ploughed fields in east of Site.
Magpie *Pica pica*	Green	x	x	x	x	
Marsh harrier *Circus aeruginosus*	Green (Schedule 1)	1	–	–	1	
Meadow pipit *Anthus pratensis*	Amber	1	1	6	6	An increase in numbers evident in February, likely indications of return passage.
Red kite *Milvus milvus*	Green (Schedule 1)	–	1	–	1	
Red-legged partridge *Alectoris rufa*	Green	x	x	x	x	
Reed bunting *Emberiza schoeniclus*	Amber	1	–	2	2	Individual birds in hedgerows.
Robin *Erithacus rubecula*	Green	x	x	x	x	
Rook *Corvus frugilegus*	Amber‡	18	51	16	51	Feeding flocks present on each survey. Very common locally.
Skylark *Alauda arvensis*	Red	6	16	33	33	Small wintering population, particularly in winter stubble. Numbers increased in February with birds returning to breeding sites or on passage (much song and display)
Starling *Sturnus vulgaris*	Red	5	–	8	8	Small foraging flocks in grassland fields in west of the Site.
Stock dove *Columba oenas*	Amber†	2	4	1	4	Small numbers in fields and at nest site (in barn owl box at Noon Folly Farm)
Woodpigeon *Columba palumbus*	Amber†	48	102	56	102	Abundant resident, feeding flocks in winter stubble.
Wren *Troglodytes troglodytes*	Amber†	x	x	x	x	Common resident.

Species	UK BoCC & Schedule 1 status	Count			Maximum count	Notes of key species
		23 Dec	18 Jan	20 Feb		
Yellowhammer *Emberiza citrinella*	Red	18	10	17	18	Individual birds or small flocks (up to 12 individuals)

x = abundant or Green-listed resident species present but not counted.

* Red-listed due to scarcity of breeding population only – common winter visitor.

† Amber-listed due to large size and European importance of large British breeding population.

‡ Amber-listed due to European Red-list status, but a common species in Britain.

4.28 The wintering assemblage was unexceptional, with a small range of species of elevated conservation concern in generally small numbers. No large flocks of winter thrushes, finches or buntings were present, in part likely due to the lack of mature hedgerows, set aside or game cover strips.

4.29 The presence of a large roosting flock of lapwings on the February visit was notable; however, this visit coincided with the recent ploughing of the fields in the east of the Site, and it is considered highly likely that this flock had been feeding in the recently ploughed fields – Gillings (1999)[9] states: *"Lapwings quickly exploited freshly ploughed fields in autumn but these fields retained their attractiveness to the birds for just a few days following the ploughing"*.

4.30 In general, lapwings show a strong preference for grassland for foraging, though arable fields are a regularly used secondary habitat, and are also used for roosting.

Evaluation

4.31 Standard procedures for assessing the value of bird communities have been established by Fuller (1980)[10]. Recording the number of species on a site can provide a simple measure of species diversity from which to confer a level of conservation importance. For breeding birds, the standard qualifying levels provided by Fuller (1980) are as follows:

- National Importance, 85+ species;
- Regional Importance, 70–84 species;
- County Importance, 50–69 species;
- Local Importance, 25–49 species.

4.32 A total of 37 species were recorded using the Site during the 2024 and 2025 breeding bird surveys; although some of these were passage migrants or birds not thought likely to have bred on the Site. The overall breeding assemblage of the Site (i.e., species nesting within the Site or immediately adjacent to it and using habitats within the Site as their primary foraging habitat) is considered to be in the range of 28–31 species in a given year, up to a maximum of around 35 species. This means the Site is likely to be of no more than **Local importance** with respect to the diversity of its breeding bird assemblage.

4.33 Fuller's standard qualifying criteria for the species diversity of wintering birds are as follows:

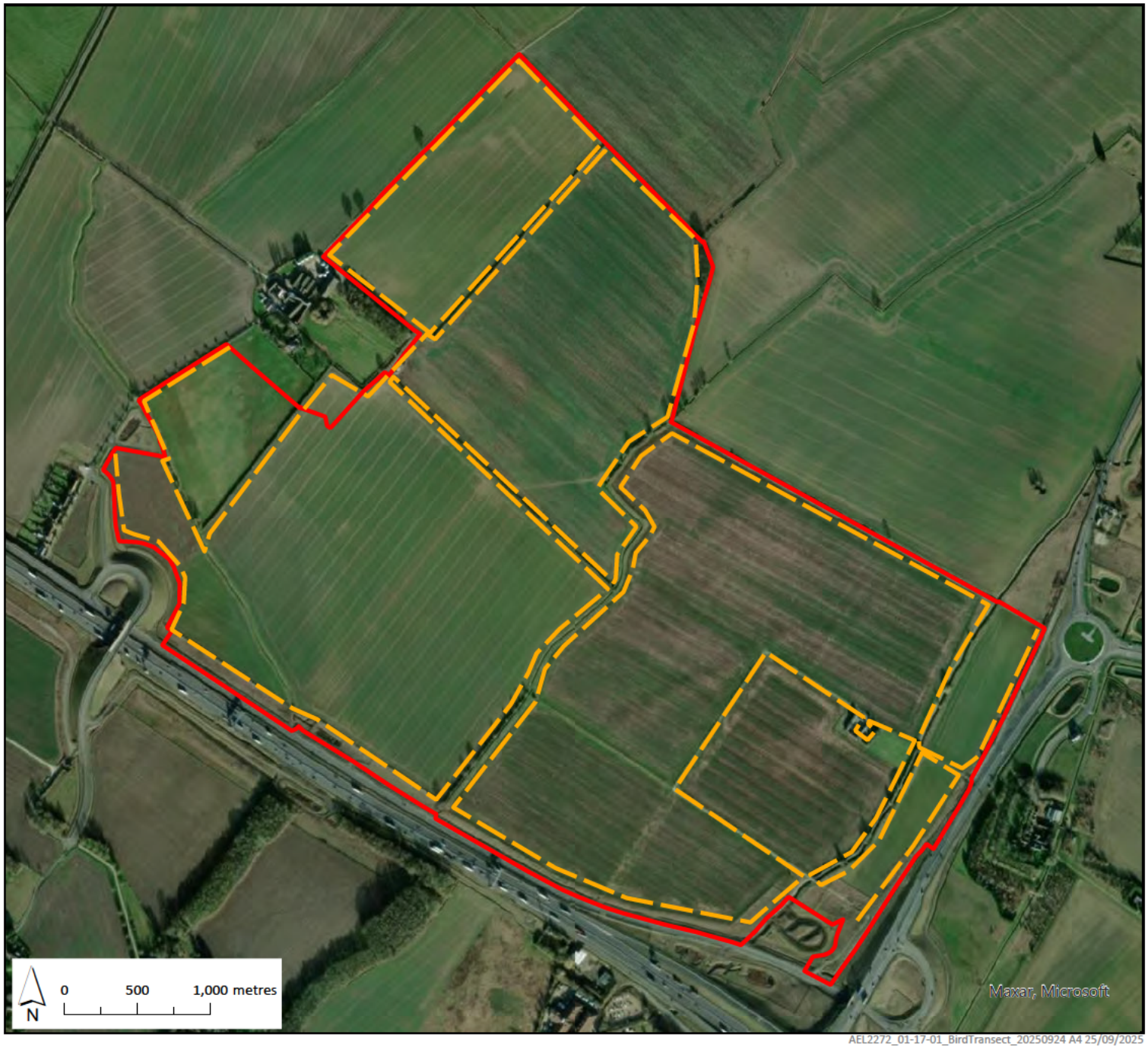
[9] Gillings, S. and Fuller, R.J. (1999) *Winter Ecology of Golden Plovers and Lapwings: A Review and Consideration of Extensive Survey Methods.* BTO Research Report No. 224, July 1999.

[10] Fuller, R.J. (1980). *A Method for Assessing the Ornithological Interest of Sites for Conservation*. Biological Conservation, 17: 229–239.

- National Importance, 115+ species;
- Regional Importance, 85–114 species;
- County Importance, 55–84 species;
- Local Importance, 25–49 species.

4.34 Even allowing for the high mobility of birds and the likelihood of species additional to those recorded by the survey using the Site, the Site is unlikely to support a wintering population of any more than Local importance with respect to the diversity of its wintering bird assemblage.

4.35 The Site does not possess any value in terms of its breeding or wintering bird population size or species rarity according to the criteria set out by Fuller (1980).



AEL2272_01-17-01_BirdTransect_20250924 A4 25/09/2025

Tritax Park, Cambridge

Bird survey transect routes

Site boundary

Transect route

Figure 4.2

Map Scale @ A4: 1:50,000

Surveyed by: n/a	
Survey date: n/a	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

AEL2272_01-21-01_BBSResults2025_20250918 A4 25/09/2025

Tritax Park, Cambridge

Breeding birds survey results - Relative density and distribution

Site boundary

Low density

High density

Relative density and distribution of all birds records across three survey visits in 2025, excluding large feeding groups of flocking species, e.g., woodpigeon; n=494

Figure 4.3

Map Scale @ A4: 1:50,000

Surveyed by: RD	
Survey date: June–July 2025	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

AEL2272_01-12-01_BBSResults_Skylark_20250922 A4 24/09/2025

Tritax Park, Cambridge

Breeding birds survey results - Skylark territories

Site boundary

Approximate extent of skylark territories

2025

2024

Figure 4.4

Map Scale @ A4: 1:50,000

Surveyed by: RD	
Survey date: 2024 / 2025	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

Badger

Approach

4.36 A search for evidence of badgers was completed during the PEA surveys on 22 April and 28 June 2024. Any badger setts found during the surveys were categorised as either main (i.e. breeding), annex, subsidiary or outlier setts[11]. A watching brief for badger activity within the Site was maintained throughout the 2025 survey period.

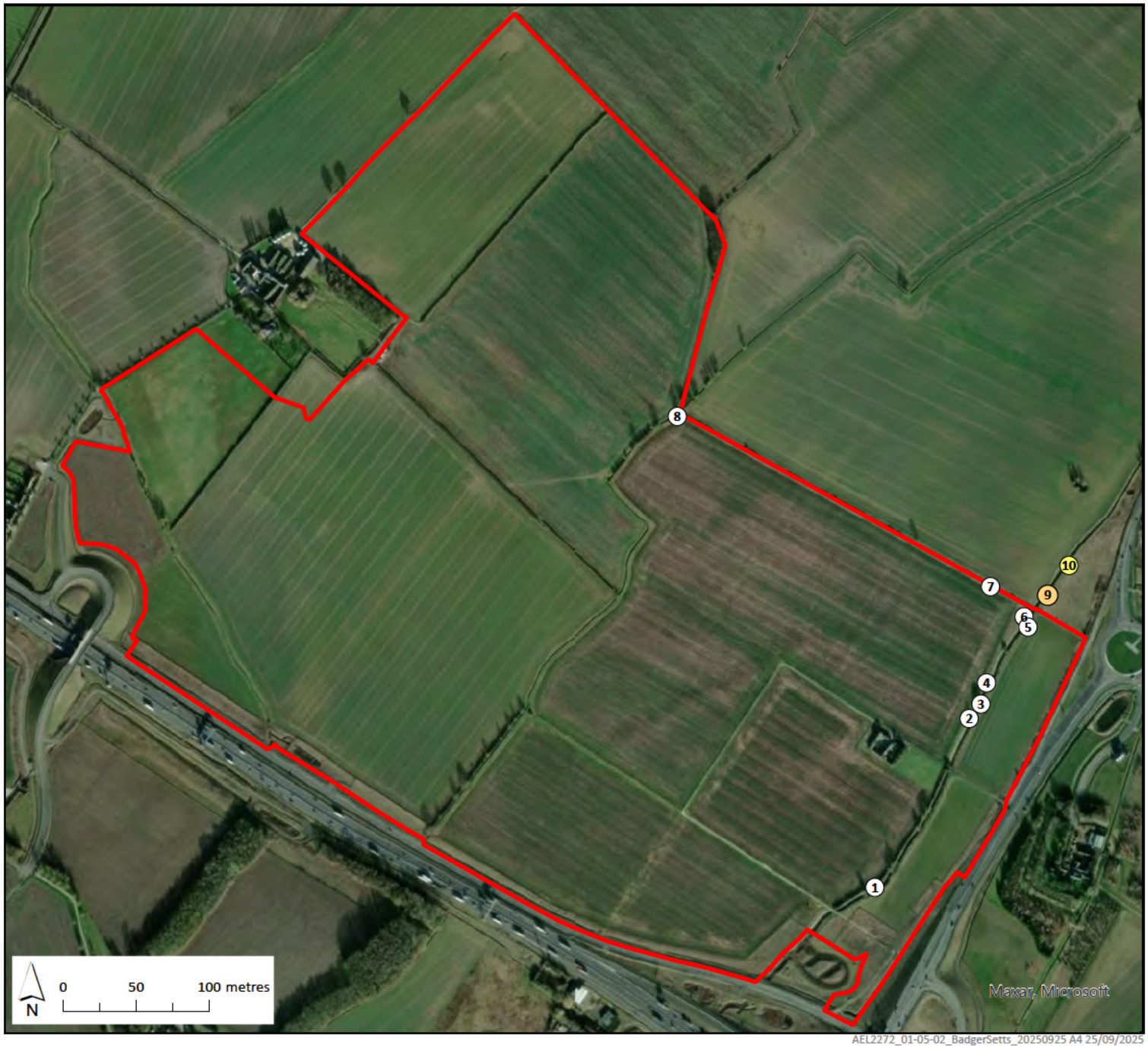
Findings

4.37 A total of eight low-status, outlier badger setts were present within the Site boundary. In addition, a likely main sett and nearby annexe sett were present just outside the northern Site boundary, dug into the banks of Longstanton Brook. The locations of these setts are shown by (confidential) **Figure 4.5** and are detailed in **Table 4.4** below.

Table 4.4: Badger setts within and in proximity to the Site.

Number	Status	Details
1	Outlier	Two partially-used entrance holes under hedgerow on top of watercourse bank.
2	Outlier	One well-used entrance hole in watercourse bank.
3	Outlier	One well-used entrance hole in watercourse bank.
4	Outlier	One well-used entrance hole in watercourse bank.
5	Outlier	One well-used entrance hole in watercourse bank.
6	Outlier	One well-used entrance hole in watercourse bank.
7	Outlier	One well-used entrance hole in ditch bank.
8	Outlier	One partially-used entrance hole in ditch bank.
9	Annexe	Three well-used and one partially used entrance hole in banks and bank top of watercourse. 30 m from Site boundary.
10	Main	Four well-used entrance holes with associated paths and spoil heaps in watercourse bank. 85 m from Site boundary.

[11] Natural England (2011). *Badgers and Development: A Guide to Best Practice and Licensing (Version 12/11).*



AEL2272_01-05-02_BadgerSetts_20250925 A4 25/09/2025

Tritax Park, Cambridge

Badger sett locations

- Site boundary
- Main sett
- Annexe sett
- Outlier sett

CONFIDENTIAL: to be removed if circulated to third parties

Figure 4.5

Map Scale @ A4: 1:5,500

Surveyed by: RD	
Survey date: 22 April & 28 June 2024	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

Water Vole and Otter

Approach

4.38 Water vole surveys were undertaken in watercourses and ditches at the Site on 21 June (eastern area only) and 27 August 2024 (whole site) by AE ecologists Richard Dale MCIEEM and Nick Bane MCIEEM. A follow-up visual inspection of the Longstanton Brook (the only ditch/watercourse holding standing water within the Site at the time) was completed on 2 October 2025 by Richard Dale and Dan Butler.

4.39 The survey approach followed best practice set out in Dean *et al* (2016)[12]. The marginal vegetation and banks of the ditches were carefully examined from within the channel for signs of water vole presence, including droppings, latrines, feeding stations, burrows, footprints and runs or pathways, as described in Strachan *et al* (2011)[13]. The survey included inspection of a strip of land up to 5 m back from the waterline, or to the edge of bank top vegetation if this was closer. All evidence of water vole presence was recorded and mapped.

4.40 In addition, any field evidence of otter was also recorded during the survey. Such signs include otter spraints, footprints, resting sites and other field signs.

Findings

4.41 The majority of ditches at the Site were largely dry by the time of the surveys and were devoid of any evidence of water vole or otter. Longstanton Brook, however, retained water throughout and supported extensive evidence of water vole. On 21 June, numerous latrines and burrows were present, particularly in the western part of the brook (in proximity to an off-site wetland area directly connected to the brook itself that represents favourable water vole habitat), though none were present in a shaded section bounded by a mature hedgerow, where in channel vegetation was less extensive. On 27 August, water vole latrines were present along the entire length of Longstanton Brook, at high density, indicating a healthy population of the species. On 2 October 2025, water vole evidence was present along the entire length of the Longstanton Brook.

4.42 No evidence of otter was observed on any survey visit.

4.43 The sections of watercourse subject to survey and the survey findings are shown in **Figure 4.6**.

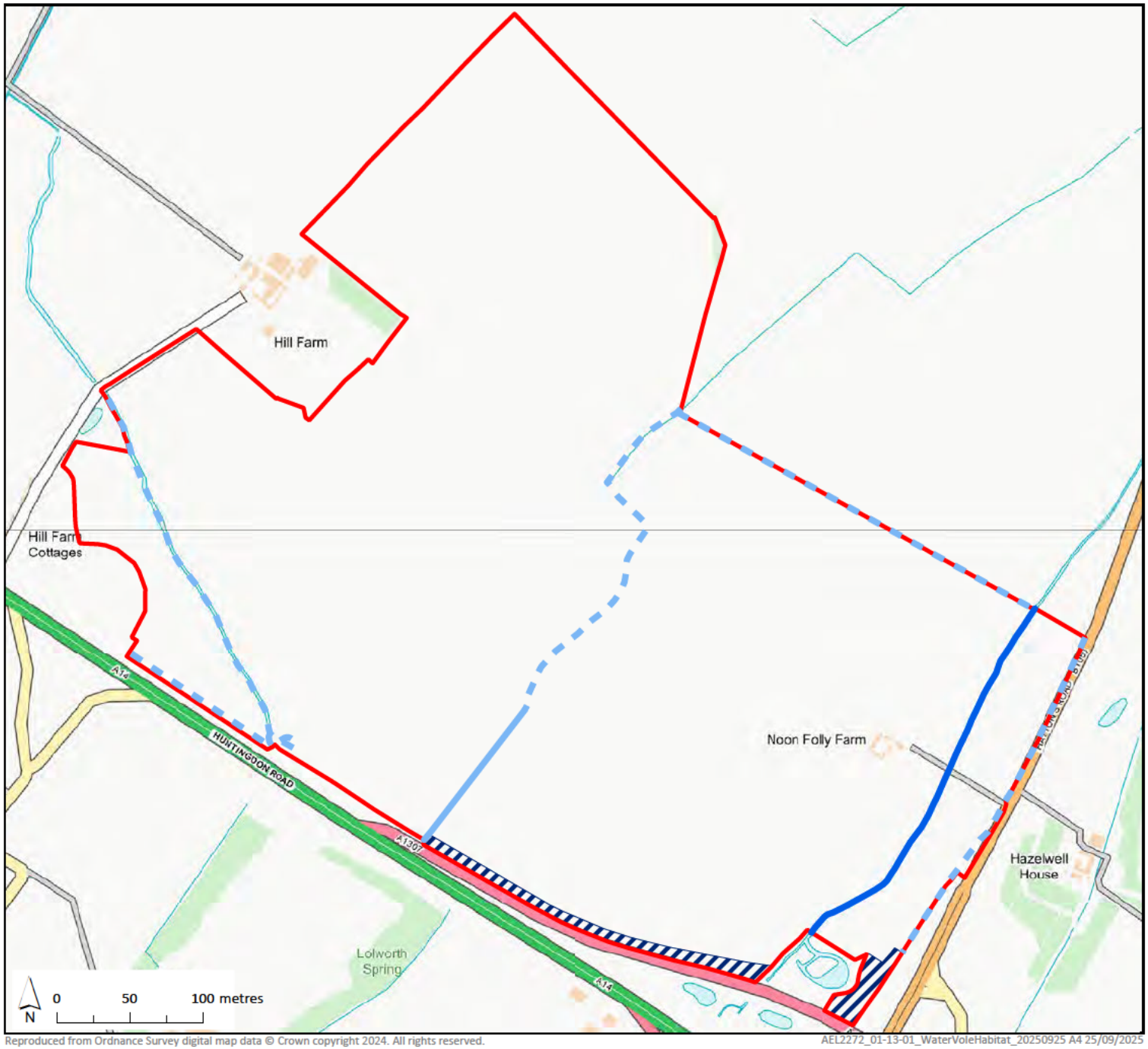
Evaluation

4.44 An apparently healthy population of water vole was present along Longstanton Brook. The species was absent from the various ditches at the Site – the majority of which are unlikely to hold water for enough of the year to represent suitable habitat.

4.45 Otter may be considered likely absent from the Site.

[12] Dean, M.; Strachan, R.; Gow, D. and Andrews, R. (2016) *The Water Voles Mitigation Handbook (The Mammal Society Mitigation Guidance Series)*. Eds Fiona Mathews and Paul Chanin. The Mammal Society, London.

[13] Strachan, R., Moorhouse, T. and Gelling, M. (2011) *Water Vole Conservation Handbook*. Third Edition. Wildlife Conservation Research Unit, Oxford.



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AEL2272_01-13-01_WaterVoleHabitat_20250925 A4 25/09/2025

Tritax Park, Cambridge

Water vole survey results

- Site boundary
- Unsurveyed land
- Wet ditch, extensive evidence of water vole
- Wet ditch, no evidence of water vole
- Ephemerally wet/dry ditch, no evidence of water vole

Figure 4.6

Map Scale @ A4: 1:5,500

Surveyed by: RD	
Survey date: 21 June & 27 August 2024	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

Bats

Approach

Bat Roosts

Preliminary Bat Roost Assessment

4.46 A preliminary bat roost assessment of the existing on-Site built structures and trees was conducted by Richard Dale MCIEEM on 22 April and 28 June 2024 as part of the PEA surveys in order to assess their potential value for roosting bats.

4.47 The inspection of structures and trees to assess their roosting use/suitability for bats can be conducted at any time of year, according to the best practice survey guidance (Collins, 2023[14]). However, finding evidence of bats (e.g., their droppings) on external surfaces that are unprotected from rainfall may be restricted if undertaken outside the main bat active season (May to September) and/or after periods of wet weather and bat droppings inside buildings may also quickly disintegrate in damp conditions – no such restrictions applied to this survey.

4.48 The on-Site structures and trees were surveyed externally and, where possible, internally in line with Collins (2023) using binoculars and torches, as necessary, to search for evidence of bats.

4.49 Evidence of bats was searched for and included live and dead bats (e.g., roosting in cracks and crevices in brickwork and structural timbers), bat droppings on walls and other exposed surfaces and staining (caused by bat fur oils and/or urine spots).

4.50 The suitability for roosting bats of the structures and trees surveyed were classified according to the categories and descriptions defined by Collins (2023) for roosting habitats, as summarised in **Tables 4.5** and **4.6**, respectively. An accurate classification of the type of Potential Roost Features (PRFs) in trees can generally only be completed during an aerial PRF inspection survey (i.e., by climbing the tree or otherwise visually inspecting the features). However, taking into account the type of feature, the size of the tree and the location of the tree relative to other habitats, an experienced surveyor can make an estimate of the PRF type present from ground level, to be confirmed by subsequent PRF inspection survey, if necessary.

Table 4.5: Guidelines for assessing the potential suitability of proposed development sites for bats, based on the present of habitat features within the landscape, to be applied using professional judgement – for bats roosting in structures (after Collins, 2023).

Suitability	Description of roosting habitat
None	No habitat features on site likely to be used any roosting bats at any time of the year (i.e., a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger number of bats (i.e., unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be sued by individual hibernating bats).

[14] Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn).* The Bat Conservation Trust, London.

Suitability	Description of roosting habitat
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g., maternity or classic cool/stable hibernation site.

Table 4.6: Guidelines for assessing the potential suitability of trees for roosting bats, and for categorising the potential suitability of PRFs for bats (after Collins, 2023).

Suitability	Description of roosting habitat
None	Either no Potential Roost Features (PRFs) in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree (e.g., tree climbing, MEWP inspection).
PRF	A tree with at least one PRF present.
PRF type	
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Bat roost emergence survey

4.51 In line with Collin 2023 good practice bat survey guidelines for buildings with low bat roost suitability, a single bat roost emergence survey was completed of the farmhouse and associated agricultural buildings at Noon Folly Farm on the evening of 17 June 2024.

4.52 The survey was planned and set-up by Dr Duncan Painter using the following survey equipment:

- Hand-held Pettersson D230 electronic bat detectors with ear-phones set in frequency division mode (x5);
- Time synchronised tripod mounted Anabat Express electronic bat detectors (x15); and
- Tripod mounted FLIR thermal video camera (x7)

4.53 The survey set-up was as shown in **Appendix B.**

4.54 The tripod-mounted Anabat Express electronic bat detectors were set-up around the periphery of each building record bat calls from the start to the end of each survey.

4.55 The manned thermal cameras were set to record radiometric video data at 30 frames per second and were used by the surveyors to provide a live view of the building throughout each survey via connected lap-top computer screen. The cameras were set up to record from 15 minutes before sunset to the end for the survey at 90 minutes after sunset.

4.56 The unmanned thermal cameras were set up to record MPEG video between 30 and 20 minutes before sunset. Video footage was checked the following day by DP against bat sightings and bat call recordings using FLIR Tools+ software. The cameras allowed accurate bat roost locations to be identified as 100% visual acuity was possible throughout each survey.

Survey limitations

4.57 The survey was completed during the main 2024 bat activity period at a time when bats were active and not in torpor and weather conditions were suitable for bats to be active throughout each survey[15].

Bat Activity

4.58 The Site was dominated by large open arable fields unconnected to any particularly large or significant areas of high value bat forage habitat. The Longstanton Brook flows though the Site and was of theoretical value to bats, but its value was considered to be reduced because of its location within an arable dominated landscape.

4.59 The objectives of the bat activity survey were to assess the range of bat species that use the Site across the three bat activity seasons of spring, summer and autumn, and complete an assessment of the value of two linear habitat features within the Site for commuting bats (Longstanton Brook and a tree lined drainage ditch).

Vantage Point Survey

4.60 Two vantage point (VP) recording locations covering the Longstanton Brook (VP1) and a tree lined drainage ditch (VP2) were surveyed over the course of the three bat activity seasons: spring (28 May 2024); summer (27 June 2024) and autumn (17 September 2024).

4.61 The location of each VP is shown by **Figure 4.7**, the three VP surveys were in weather conditions that were considered optimal for bats to be active, i.e., in air temperatures in excess of 10 °C, with no rainfall or strong winds.

4.62 During each survey a surveyor was stationed at each VP on a camping chair to record bat activity. Each surveyor was equipped with a hand-held full spectrum electronic bat detector (Elekon Batlogger M) and a tripod mounted FLIR T540 thermal camera set up to record MPEG video with the screen at the back of the camera providing the surveyor with a live view of bat activity throughout the survey.

4.63 Each survey commenced at 15 minutes before sunset and continued for 90 minutes after sunset. All bats seen and heard, direction of flight and bat activity type were recorded. The thermal video recordings and bat calls recorded by the Elekon bat detector were checked the following day using a PC to verify sightings and bat species identification.

4.64 Vantage point location thermal camera fields of view are shown in **Appendix B**.

Night-time bat walkover (NBW) survey

4.65 A night-time bat walkover survey of the entire Site was completed by three surveyors on the evening of 13 August 2025 in dry and calm weather conditions. Each surveyor was equipped with a hand-held full spectrum electronic bat detector (Elekon Batlogger M) that was used to record automatically all bat calls and the route of each surveyor. The surveyors remained stationary at the start of the survey from 15 minutes before sunset to 30 minutes after sunset to record bat commuting activity from a fixed vantage point close to a habitat feature considered to be of value to commuting bats (hedgerow or watercourse). Thereafter the surveyors each walked a pre-determined transect route around the Site noting any bats seen or heard and their activity – the three vantage point locations and transect walking routes are shown by **Figure 4.7**.

[15] 17 June 2024: average air temperature 17.0 °C (start) 13.0 °C (end), still, no rain, 3% cloud cover (start).

Automated Survey

4.66 In 2024, an automated bat detector survey of the Site was completed using Song Meter SM4Bat full spectrum electronic bat detectors set-up to record bat activity in two locations considered to have relatively high, and low suitability for bats – Hedgerow alongside Longstanton Brook (high value); and the middle of arable field next to a concrete access track (low value).

4.67 The three locations were subject to three multiple night surveys in the spring, summer and autumn seasons:

- Spring – six nights (both locations) – 27 May – 1 June 2024;
- Summer – five nights (Longstanton Brook) – 16–20 August 2024; three nights arable – (16–18 August 2024[16])
- Autumn – seven nights (arable) – 1–7 September 2024; five nights (Longstanton Brook) – 17–21 September 2024.

4.68 In 2025 a fourth automated bat detector location was surveyed:

- Summer – five nights (hedgerow with trees) – 12-16 August 2025.

4.69 The locations of long-term bat detectors and survey vantage points are shown in **Figure 4.7**.

Bat Call Analysis

4.70 All bat calls recorded by the electronic bat detectors employed during the surveys were analysed to the highest practicable taxonomic level using proprietary bat call analysis software[17] using a PC in accordance with Russ 2017[18]. Bat calls were analysed by experienced staff who have been trained in bat call analysis.

Findings

Preliminary Bat Roost Assessment

4.71 The survey identified six trees with PRFs potentially suitable for roosting bats, as detailed in **Table 4.7** below and shown in **Figure 4.8**.

Table 4.7: Trees with PRFs.

Number	Description
1	Large willow with severely split and rotten trunk – possible PRF-M.
2	Ash with large rot hole in trunk – possible PRF-M (also with kestrel/owl nest box).
3	Large willow with two major dead / rotten limbs, loose bark – likely PRF-I.
4	Ash with single limb scar / rot hole and woodpecker hole – possible PRF-M.
5	Ash with rot hole in trunk – possible PRF-M.
6	Ash with two woodpecker holes – possible PRF-M.

4.72 The buildings present were all at Noon Folly Farm in the east of the Site, comprising a residential farmhouse and a range of farm outbuildings and barns, described in detail below.

[16] Detector failed after night three.
[17] BatExplorer V2.2.4.0; and Analook
[18] Russ, J. (2017) *British Bat Calls – A Guide to Species Identification*. Pelagic Publishing

Building 1

4.73 Residential dwelling of brick construction with a slate-tiled gable roof. No evidence of roosting bats was found; however, no internal inspection as possible and gaps of various sizes were present beneath lifted roof slates, with at least one gap beneath a ridge tile on the south face of the roof.

4.74 The building had the potential to support individual roosting bats and was assessed as a building of **low bat roost suitability**.

Building 2

Timber framed cart lodge, with unlined pitched corrugated metal roof covering. No evidence of bats was present, but there was some potential for individual roosting bats to be present in gaps between apex roof beams and roof panelling, or behind damaged wood panelling on timber internal partitions.

4.75 The building had the potential to support individual roosting bats and was assessed as a building of **low bat roost suitability**.

Building 3

4.76 A single-storey brick-built storage outbuilding with windows and an unlined, timber-framed roof of corrugated fibre cement sheeting. Although the interior of the building was well-lit and no evidence of roosting bats was present either externally or internally, there were gaps between damaged brickwork and beneath ridge panelling.

4.77 The building had the potential to support individual roosting bats and was assessed as a building of **low bat roost suitability**.

Building 4

4.78 A single-storey brick-built office-type outbuilding with windows and a gable roof of interlocking concrete tiles. No internal inspection was possible, and no evidence of bats was present on the exterior of the building. The roof was in good condition, with tight-fitting concrete pantiles throughout and a heavy covering of moss. Small soffit boxes were present on the longer sides of the roof, and these were in good condition and tight fitting. The south-west side of the building, including the lower edge of the roof, was heavily obscured by adjacent garden vegetation.

4.79 The building was assessed as a building of **low bat roost suitability**.

Building 5 & 6

4.80 Two adjacent open-fronted hay barns with metal frames, clad and roofed in corrugated metal sheeting. Neither barn had any evidence of roosting bat presence or any features of value to roosting bats.

4.81 The barns were assessed as buildings of **negligible bat roost suitability**.

Building 7

4.82 A single storey outbuilding of brick and timber construction with a sloping, timber-framed roof of corrugated metal sheeting. A few small potential bat roost features, such as gaps in brickwork or between brickwork and doorframes or roof panels, were present internally, but given its small size it was possible to directly inspect all features present and no evidence of roosting bats was found.

4.83 The building was assessed as a building of **low bat roost suitability**.

Building 8

4.84 A small wooden garden shed with no evidence of roosting bats and no features of obvious value to bats.

4.85 The shed was assessed as a building of **negligible bat roost suitability**.

Bat roost emergence survey

4.86 No bats were seen or filmed emerging from roost locations in buildings at Noon Folly Farm during the bat roost emergence survey.

4.87 The first bat recorded was a single common pipistrelle that flew onto Site from the east alongside the concrete access track at 21:47 (23 minutes after sunset). Regular foraging activity by a single common pipistrelle within the farm building complex was recorded thereafter until the end of the survey.

4.88 No more than one bat was seen at any one time, and no other species of bat was recorded by the surveyors or the 15 static detectors positioned around the farm.

Vantage point survey

4.89 No bat commuting activity was recorded at either vantage point location during any of the three surveys in 2024 or during the single summer activity survey (three surveyor vantage point locations) in August 2025.

4.90 Individual foraging common pipistrelle bats were recorded towards the end of the survey in summer and autumn at vantage point 1 (Longstanton Brook); and a single foraging common pipistrelle was recorded at vantage point 2 during the autumn survey.

Night-time bat walkover (NBW) survey

4.91 The summer 2025 NBW survey recorded small numbers of individual common pipistrelle bats across the Site with most activity common pipistrelle activity associated with a dry drainage ditch and recently established roadside neutral grassland along the southern boundary of the Site. Here it appeared that single bat was foraging and was recorded on a number of different occasions. Occasional passes of high flying noctule bats over the Site were also recorded, but the survey verified that the majority of the arable land surveyed was devoid of bat activity. Bat registrations recorded during the survey are shown on **Figure 4.9**.

Automated Survey - 2024

4.92 Relatively low levels of bat activity were recorded across the Site by the automated survey, with the high value recording location (Longstanton Brook / hedge) recording a mean of 165 bat call files a night over the three seasons (16 recording nights – range 13–767 call files per night), compared to a mean of 15 bat call files over the same survey period (16 recording nights - range 0–46 call files per night) at the low bat forage value arable recording location.

4.93 A total of seven bat species were recorded by the survey over the three seasons, with mor species recorded alongside the Longstanton Brook compared to the arable site. The majority of all recorded calls over the three seasons were made up of the calls of three species: common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus*, noctule *Nyctalus noctula*.

4.94 Barbastelle *Barbastelle barbastellus* a nationally rare and light-averse species was conspicuous by its absence from the Site in spring and summer but was recorded on one occasion next to Longstanton Brook in the autumn. The bat was recorded late into the night at 01:49 with no early or late calls to indicate a nearby roost.

4.95 Another less common bat recorded during the survey was serotine *Eptesicus serotine* recorded on one occasion in the summer next to Longstanton Brook at 23:47 indicating that it had not been roosting particularly close to the Site.

Automated Survey - 2025

4.96 The single five-night automated bat detector survey in August 2025 recorded a similar assemblage of bats and low levels of bat activity as recorded in 2024 with seven bat species recorded dominated by common pipistrelle (71.2% of all recorded calls); soprano pipistrelle (20.2%) and noctule (5%).

4.97 A single call of barbastelle was recorded on one night at 00.22.

Table 4.7: Total number & percentage of recorded bat species call files by survey season and location

Species & rarity category[19]	Spring 2024		Summer 2024		Autumn 2024	
	Longstanton Brook	***Arable***	***Longstanton Brook***	***Arable***	***Longstanton Brook***	***Arable***
Common pipistrelle (widespread)	1,118 (98.8%)	2 (8.3%)	387 (74.6%)	32 (53.3%)	185 (18.7%)	69 (43.4%)
Soprano pipistrelle (widespread)	6 (0.5%)	–	99 (19.1%)	19 (31.7%)	751 (75.8%)	51 (32.1%)
Noctule (widespread but less abundant)	7 (0.6%)	22 (91.7%)	27 (5.2%)	4 (6.7%)	51 (5.1%)	34 (21.4%)
Daubenton's (widespread but less abundant)	1 (0.1%)	–	3 (0.6%)	3 (5.0%)	3 (0.3%)	5 (3.1%)
Brown long-eared (widespread)	–	–	2 (0.4%)	2 (3.3%)	–	–
Serotine (rarer / restricted distribution)	–	–	1 (0.2%)	–	–	–
Barbastelle (rare)	–	–	–	–	1 (0.1%)	–

[19] Reason, P.F and Wray, S (2023) *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. CIEEM, Ampfield

Evaluation

4.98 No evidence to indicate the presence of building roost of bats has been recorded by the current survey.

4.99 A total of six field edge trees within the Site have potential bat roost features that could support multiple roosting bats and would need to be further investigated by aerial inspection if they cannot be retained and protected as part of development planning.

4.100 In accordance with current bat mitigation guidelines and the rarity categories ascribed to bats by Reason & Wray (2023), the seven species bat assemblage recorded next to the Longstanton Brook scores a total of 14 points out of a maximum possible total of 28 for East Anglia. This equates to 50% which is above the 45% threshold for County importance but below the 55% threshold for Regional.

4.101 The bulk of the Site is arable land that has a total score of seven points out of a total of 28 (25%) which confers the arable land within the Site of no particular nature conservation importance for bats

AEL2272_01-14-01_BatSetup_20250925 A4 25/09/2025

Tritax Park, Cambridge

Bat activity survey results

- Site boundary
- Approximate extent of proposed developed area
- Survey vantage point, 2024
- SM4 long-term bat detector, 2024
- Survey vantage point, 2025
- SM4 long-term bat detector, 2025

2025 survey transect routes

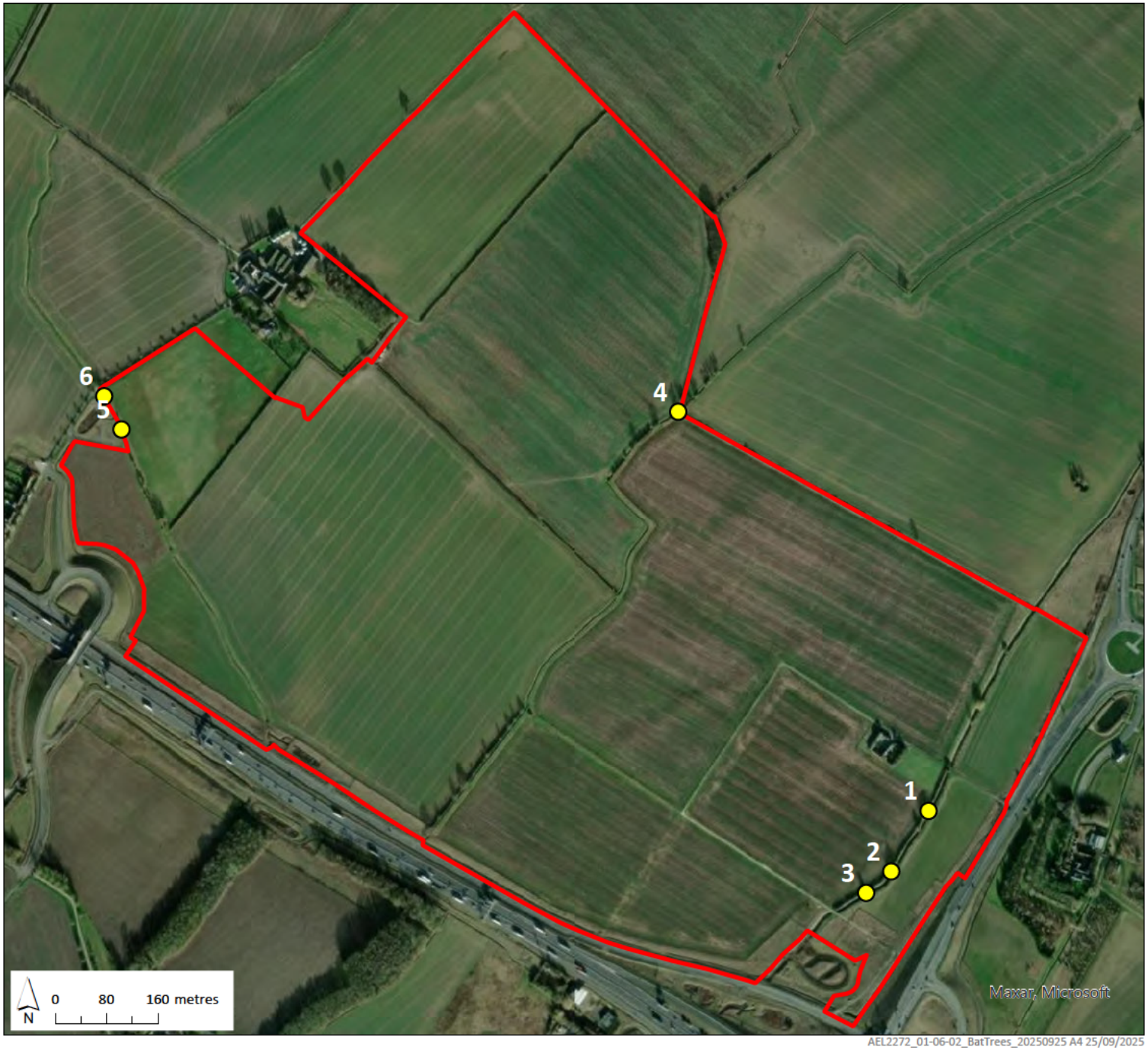
- Surveyor 1 route
- Surveyor 3 route
- Surveyor 2 route

Figure 4.7

Map Scale @ A4: 1:9,000

Surveyed by: RD, ES, and DB	
Survey date: May–Sept 2024; Aug 2025	
Drawn by: ES	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY



AEL2272_01-06-02_BatTrees_20250925 A4 25/09/2025

Tritax Park, Cambridge

Trees with bat roost potential

Site boundary

trees with PRFs

Figure 4.8

Map Scale @ A4: 1:9,000

Surveyed by: RD	
Survey date: 22 April & 28 June 2024	
Drawn by: RD	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

Tritax Park, Cambridge

Bat activity survey results

Site boundary

Approximate extent of proposed developed area

2025 survey transect routes

Surveyor 1 route

Surveyor 2 route

Surveyor 3 route

Bat registrations

Common pipistrelle

Noctule

Figure 4.9

Map Scale @ A4: 1:9,000

Surveyed by: RD, ES, and DB	
Survey date: 12 August 2025	
Drawn by: ES	
Checked by: DP	
Status: Final	

APPLIED ECOLOGY

AEL2272_01-19-00_BatActivityResults_20250814 A4 25/09/2025

5 Conclusions and Recommendations

Conclusions

Protected sites

5.1 The Site is not covered by any statutory or non-statutory wildlife site designation and does not comprise ancient woodland.

5.2 The nearest statutory designated site is **Overhall Grove Site of Special Scientific Interest (SSSI)**, located 3.3 km to the south-west of the Site. The Site lies within a Natural England (NE) SSSI Impact Risk Zone in relation to this SSSI. Natural England has identified six development types[20] they consider constitute a potential threat to the SSSI; however, a commercial distribution development as proposed is not considered to constitute a threat to the SSSI either as a result of its construction or operation.

5.3 No non-statutory protected sites were present within 2 km of the Site.

5.4 Development-related impacts on nearby protected wildlife sites are considered highly unlikely, due the type of development proposed and its distance from any protected wildlife site.

Habitats

5.5 The Site was dominated by arable and associated species-poor grassland habitats of low relative nature conservation and biodiversity importance that do not represent a significant development constraint. Hedgerows, trees and woodland, and ditches, particularly Longstanton Brook, represent habitats of elevated ecological significance and should be retained and protected where practicable during development planning.

Fauna

5.6 Great crested newt was confirmed as absent from the five waterbodies within 250 m of the Site that were not isolated by barriers impassable to dispersing GCN. The species is considered likely absent from aquatic and terrestrial habitat within the Site.

5.7 The Site supports a relatively limited breeding bird assemblage, of no more than local importance with respect to its diversity. The assemblage is dominated by skylark, a red-listed farmland specialist species of elevated conservation concern, with a population of around 12–13 territories present.

[20]
- **Infrastructure:** Airports, helipads and other aviation proposals.
- **Wind and Solar:** Solar schemes with a footprint > 0.5 ha, all wind turbines.
- **Air Pollution:** Livestock & poultry units with a floorspace > 500 m², slurry lagoons > 750 m² & manure stores > 3,500 tonnes.
- **Combustion:** General combustion processes >50 MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.
- **Waste:** Landfill. Including: inert landfill, non-hazardous landfill, hazardous landfill.
- **Discharge:** Any discharge of water or liquid waste of more than 20 m³/day that is discharged to ground (i.e., to seep away) or to surface water, such as a beck or stream.

5.8 The wintering bird assemblage was unexceptional, given the size of the Site, and of no more than Local importance.

5.9 A number of badger setts were present within the Site, although all were low-status outliers (a likely main sett and associated annexe sett were present outside the Site boundary).

5.10 Longstanton Brook supported a population of water vole and was found to be of County importance on the basis of the bat assemblage it sustains. The bulk of the Site was arable land that bat survey work indicates to be of no particular importance for bats.

Recommendations

Initial development guidance

5.11 Precise Development mitigation and compensation requirements will be dependent on the scale of development proposed, design detail and the results of ongoing ecological survey work. However, the following high-level advice should be considered at this early stage in order to demonstrate biodiversity enhancement can be achieved in line with local and national planning policy:

- Existing trees, hedgerows and watercourses, particularly Longstanton Brook, should be retained, protected and enhanced, where feasible.
- Consider opportunities for incorporating ecological enhancements alongside proposed drainage, access and landscape design provisions in order to achieve an overall biodiversity net gain. An initial assessment of the emerging Illustrative Framework suggests that a 10% net gain can comfortably be achieved (and exceeded) on site.
- Artificial lighting should be avoided / minimised in proximity to retained hedgerows and boundary habitats, and any other proposed green corridors, in order to minimise disturbance to bats and other nocturnal species.
- Incorporate bat and bird boxes into new buildings.
- Appropriate impact avoidance measures to protect badger setts from disturbance and/or damage during the Development will need to be informed by future, detailed development proposals. Ideally, known active badger setts would be protected via development-free buffer zones, or if this is not possible, then setts may potentially be closed under Natural England licence.
- If impacts are predicted to occur to Longstanton Brook, this is likely to require to take place under the auspices of a Natural England licence, and would require the creation of compensatory habitat and potential capture and relocations of individual water voles.

Vegetation Clearance

5.12 The clearance of any vegetation and soil stripping should take place outside the bird breeding season, in the period September–February, or immediately after a check by an experienced ornithologist that verifies nesting bird absence from the Site

Appendix A

Proposed Site Layout

Appendix B

Plant Species Lists

Notes: DAFOR: D = dominant, A = abundant, F = frequent, O = occasional, R = rare, (LD = locally dominant).

Improved grassland (eastern area, north of access track).

Species	DAFOR
Italian rye-grass *Lolium multiflorum*	D
Bristly oxtongue *Picris echioides*	A
Black grass *Alopecurus myosuroides*	F
Meadow foxtail *Alopecurus pratensis*	F
Oat *Avena sativa*	F
Cock's-foot *Dactylis glomerata*	O
Creeping bent *Agrostis stolonifera*	O
Soft brome *Bromus hordeaceus*	O
False oat-grass *Arrhenatherum elatius*	O
Barren brome *Anisantha sterilis*	O
Goat's-beard *Tragopogon pratensis*	O
Hogweed *Heracleum sphondylium*	O
Spear thistle *Cirsium vulgare*	O
Smooth sow-thistle *Sonchus oleraceus*	O
Field bindweed *Convolvulus arvensis*	O
Cut-leaved crane's-bill *Geranium dissectum*	O
Willowherb *Epilobium* spp.	O
Smooth tare *Vicia tetrasperma*	O
Creeping thistle *Cirsium arvense*	O
Yorkshire-fog *Holcus lanatus*	O

Improved grassland (eastern area, south of access track).

Species	DAFOR
Soft brome *Bromus hordeaceus*	D
Black grass *Alopecurus myosuroides*	A
Bristly oxtongue *Picris echioides*	A
Cock's-foot *Dactylis glomerata*	F
Meadow foxtail *Alopecurus pratensis*	F
Red fescue *Festuca rubra*	F
Creeping bent *Agrostis stolonifera*	F
Crested dog's-tail *Cynosurus cristatus*	O
Common ragwort *Senecio jacobaea*	O
Creeping buttercup *Ranunculus repens*	O
Linseed *Linum usitatissimum*	O
Common mouse-ear *Cerastium fontanum*	O
Spear thistle *Cirsium vulgare*	O
Prickly sow-thistle *Sonchus asper*	O
Daisy *Bellis perennis*	O
Cut-leaved crane's-bill *Geranium dissectum*	O

Species	DAFOR
Black medick *Medicago lupulina*	O
Creeping thistle *Cirsium arvense*	O
Goat's-beard *Tragopogon pratensis*	O
Smooth tare *Vicia tetrasperma*	R
Oxeye daisy *Leucanthemum vulgare*	R
Smooth tare *Vicia tetrasperma*	R
Hogweed *Heracleum sphondylium*	R

Improved grassland – field east of farm buildings.

Species	DAFOR
Italian rye-grass *Lolium multiflorum*	A
Soft brome *Bromus hordeaceus*	A
Cock's-foot *Dactylis glomerata*	F
False oat-grass *Arrhenatherum elatius*	F
Smooth meadow-grass *Poa pratensis*	F
Cleavers *Galium aparine*	O
Hogweed *Heracleum sphondylium*	O
Cut-leaved crane's-bill *Geranium dissectum*	O
Cow parsley *Anthriscus sylvestris*	O
Bristly oxtongue *Picris echioides*	O

Improve grassland – western area

Species	DAFOR
Perennial rye-grass *Lolium perenne*	D
Yorkshire-fog *Holcus lanatus*	O
Crested dog's-tail *Cynosurus cristatus*	O
Meadow barley *Hordeum brachyantherum*	O
Soft brome *Bromus hordeaceus*	O
Common bent *Agrostis capillaris*	O
Creeping bent *Agrostis stolonifera*	O
Common ragwort *Senecio jacobaea*	O
Common mouse-ear *Cerastium fontanum*	O
Creeping thistle *Cirsium arvense*	O
Bristly oxtongue *Picris echioides*	O
Spear thistle *Cirsium vulgare*	O
Slender tare *Vicia parviflora*	O

Poor semi-improved neutral grassland – banks of Longstanton Brook.

Species	DAFOR
Meadow foxtail *Alopecurus pratensis*	A
False oat-grass *Arrhenatherum elatius*	F
Common couch *Elytrigia repens*	F
Smooth meadow-grass *Poa pratensis*	F

Species	DAFOR
False brome *Brachypodium sylvaticum*	F
Tor-grass *Brachypodium pinnatum*	F
Cock's-foot *Dactylis glomerata*	F
Meadow vetchling *Lathyrus pratensis*	F
Lesser celandine *Ficaria verna*	F
Cock's-foot *Dactylis glomerata*	F
Perennial rye-grass *Lolium perenne*	O
Cleavers *Galium aparine*	O
Dandelion *Taraxacum officinale* agg.	O
Field horsetail *Equisetum arvense*	O
Common ragwort *Senecio jacobaea*	O
Cowslip *Primula veris*	O
Colt's-foot *Tussilago farfara*	O
Ground-ivy *Glechoma hederacea*	O
White campion *Silene latifolia*	O
Ivy-leaved speedwell *Veronica hederifolia*	O
Wavy bittercress *Cardamine flexuosa*	O
Red dead-nettle *Lamium purpureum*	O
Cow parsley *Anthriscus sylvestris*	O
Broad-leaved dock *Rumex obtusifolius*	O
White dead-nettle *Lamium album*	O
Creeping buttercup *Ranunculus repens*	O
Ribwort plantain *Plantago lanceolata*	O
Hedge bedstraw *Galium mollugo*	O
Common nettle *Urtica dioica*	O
Hogweed *Heracleum sphondylium*	O
Garlic mustard *Alliaria petiolata*	O
cut-leaved crane's-bill *Geranium dissectum*	O
Blackthorn *Prunus spinosa*	O
Common knotgrass *Polygonum aviculare*	O
Charlock *Sinapis arvensis*	O
Herb-Robert *Geranium robertianum*	O
Spear thistle *Cirsium vulgare*	O
Hawthorn *Crataegus monogyna* (saplings)	O
Blackthorn *Prunus spinosa* (saplings)	O
Lady's bedstraw *Galium verum*	R

Poor semi-improved neutral grassland – arable field margins.

Species	DAFOR
Cock's-foot *Dactylis glomerata*	A
Barren brome *Anisantha sterilis*	A
False oat-grass *Arrhenatherum elatius*	F
Barren brome *Anisantha sterilis*	F

Species	DAFOR
Smooth meadow-grass *Poa pratensis*	F
Meadow foxtail *Alopecurus pratensis*	F
Common couch *Elytrigia repens*	F
Hogweed *Heracleum sphondylium*	F
Cow parsley *Anthriscus sylvestris*	F
Cleavers *Galium aparine*	F
Common nettle *Urtica dioica*	F
Clustered dock *Rumex conglomeratus*	F
Curled dock *Rumex crispus*	F
White dead-nettle *Lamium album*	F
Perennial rye-grass *Lolium perenne*	O
Tall fescue *Festuca arundinacea*	O
Hemlock *Conium maculatum*	O
Field bindweed *Convolvulus arvensis*	O
Field horsetail *Equisetum arvense*	O
Creeping thistle *Cirsium arvense*	O
Cut-leaved crane's-bill *Geranium dissectum*	O
Spear thistle *Cirsium vulgare*	O
Bramble *Rubus fruticosus*	O

Poor semi-improved neutral grassland – south-east of Site.

Species	DAFOR
Soft brome *Bromus hordeaceus*	F
Barren brome *Anisantha sterilis*	F
Cock's-foot *Dactylis glomerata*	F
False oat-grass *Arrhenatherum elatius*	F
Red fescue *Festuca rubra*	F
Bristly oxtongue *Picris echioides*	F
Thyme-leaved speedwell *Veronica serpyllifolia*	F
Yorkshire-fog *Holcus lanatus*	O
Tall fescue *Festuca arundinacea*	O
Black grass *Alopecurus myosuroides*	O
Hogweed *Heracleum sphondylium*	O
Dandelion *Taraxacum officinale* agg.	O
Yarrow *Achillea millefolium*	O
Common ragwort *Senecio jacobaea*	O
Creeping thistle *Cirsium arvense*	O
Common cat's-ear *Hypochaeris radicata*	O
Greater plantain *Plantago major*	O
Spear thistle *Cirsium vulgare*	O
Clustered dock *Rumex conglomeratus*	O
Wild teasel *Dipsacus fullonum*	O
Willowherb *Epilobium* spp.	O

Species	DAFOR
Creeping buttercup *Ranunculus repens*	O
Hoary ragwort *Senecio erucifolius*	O
Hedge bedstraw *Galium mollugo*	O
Lady's bedstraw *Galium verum*	R
Oxeye daisy *Leucanthemum vulgare*	R

Poor semi-improved neutral grassland – along ditch on eastern boundary, north of access track.

Species	DAFOR
Bramble *Rubus fruticosus*	F
Red fescue *Festuca rubra*	F
Yorkshire-fog *Holcus lanatus*	F
Creeping bent *Agrostis stolonifera*	F
Common couch *Elytrigia repens*	F
Great willowherb *Epilobium hirsutum*	F
Creeping thistle *Cirsium arvense*	F
Ground-ivy *Glechoma hederacea*	F
Common ragwort *Senecio jacobaea*	O
Field bindweed *Convolvulus arvensis*	O
False oat-grass *Arrhenatherum elatius*	O
Cock's-foot *Dactylis glomerata*	O
Weld *Reseda luteola*	O
Meadowsweet *Filipendula ulmaria*	O
Bristly oxtongue *Picris echioides*	O
Blackthorn *Prunus spinosa*	O
Hawthorn *Crataegus monogyna*	O
Dog rose *Rosa canina*	O
Hogweed *Heracleum sphondylium*	O
Black horehound *Ballota nigra*	O
Willowherb *Epilobium* spp.	O
Hemlock *Conium maculatum*	O
Charlock *Sinapis arvensis*	O
Common mallow *Malva sylvestris*	O
White campion *Silene latifolia*	O

Semi-improved neutral grassland – southern boundary.

Species	DAFOR
Oxeye daisy *Leucanthemum vulgare*	D
Red fescue *Festuca rubra*	F
Crested dog's-tail *Cynosurus cristatus*	F
Tall fescue *Festuca arundinacea*	F
Common bent *Agrostis capillaris*	F
Red fescue *Festuca rubra*	O

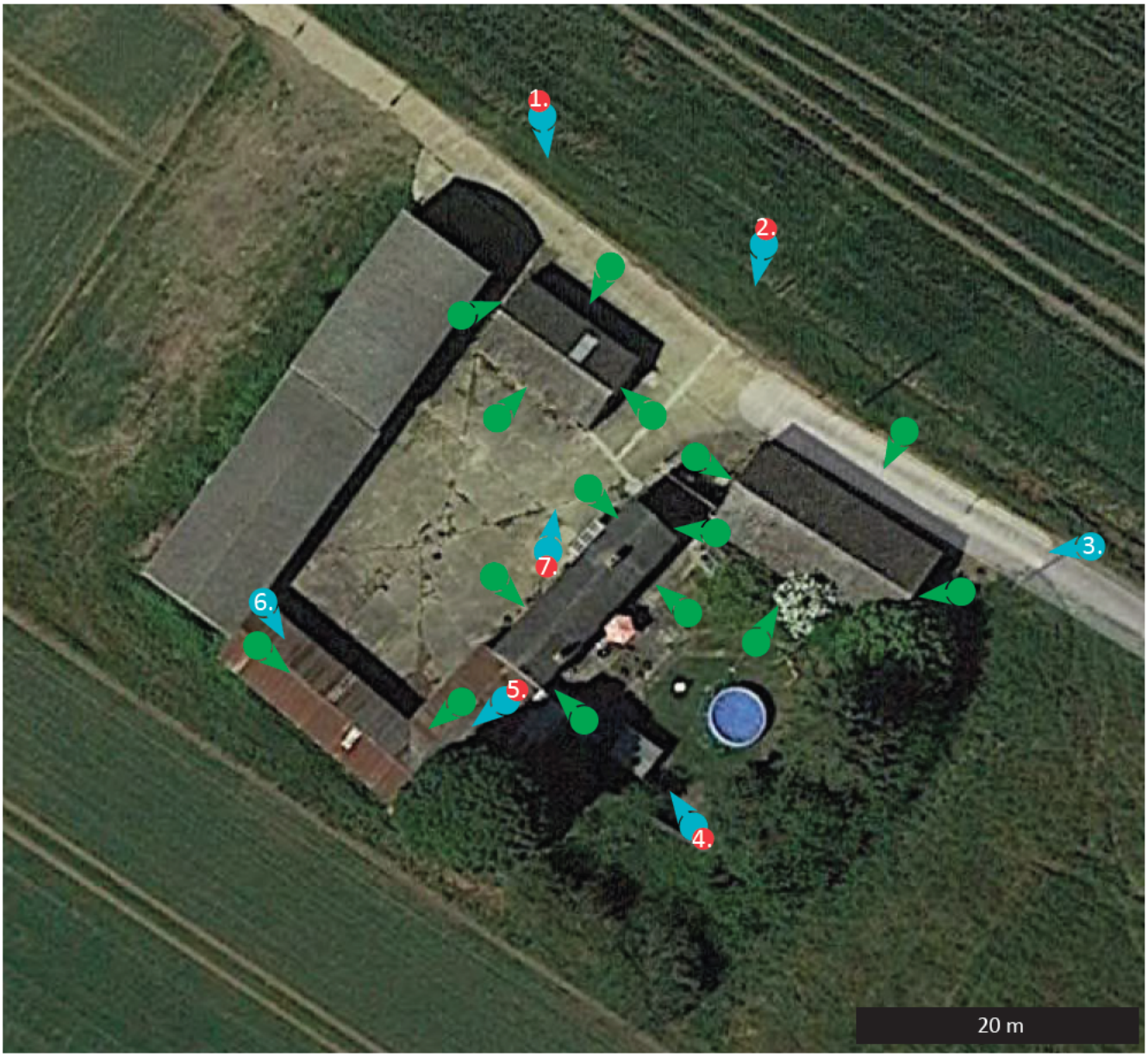
Species	DAFOR
Meadow foxtail *Alopecurus pratensis*	O
Soft brome *Bromus hordeaceus*	O
Timothy *Phleum pratense*	O
Squirrel-tail fescue *Vulpia bromoides*	O
Annual beard-grass *Polypogon monspeliensis*	R
Slender tare *Vicia parviflora*	A
Bird's-foot trefoil *Lotus corniculatus*	F
Selfheal *Prunella vulgaris*	F
Curled dock *Rumex crispus*	O
Creeping buttercup *Ranunculus repens*	O
Yarrow *Achillea millefolium*	O
Lady's bedstraw *Galium verum*	O
Bristly oxtongue *Picris echioides*	O
Creeping thistle *Cirsium arvense*	O
Spear thistle *Cirsium vulgare*	O
Hedge bedstraw *Galium mollugo*	O
Black medick *Medicago lupulina*	O

Flowing water – Longstanton Brook (in channel and bankside vegetation).

Species	DAFOR
Meadowsweet *Filipendula ulmaria*	A
Lesser celandine *Ficaria verna*	A
Clustered dock *Rumex conglomeratus*	A
Fool's watercress *Apium nodiflorum*	F
Yellow iris *Iris pseudacorus*	F
Curled pondweed *Potamogaton crispus*	F
Common water starwort *Callitriche stagnalis*	F
Reed canary-grass *Phalaris arundinacea*	F
Hard rush *Juncus inflexus*	F
Bramble *Rubus fruticosus*	F
Ground-ivy *Glechoma hederacea*	F
Hemlock *Conium maculatum*	F
Water figwort *Scrophularia auriculata*	O
Bulrush *Typha latifolia*	O
Water plantain *Alisma plantago-aquatica*	O
Wild teasel *Dipsacus fullonum*	O
Hemlock *Conium maculatum*	O

Appendix C

Bat Activity Survey FLIR Views



Key

N

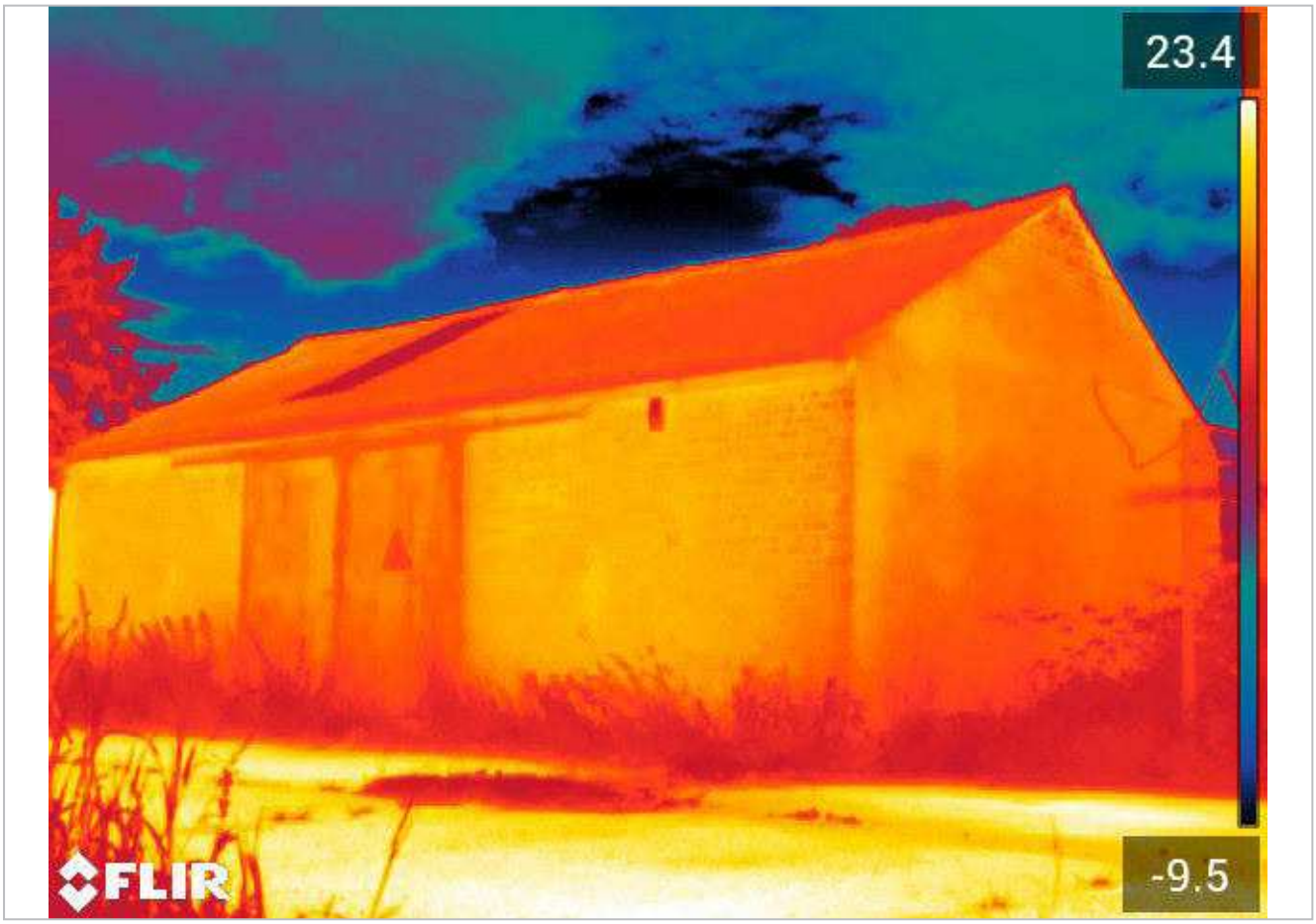
Tripod mounted time synchronised Anabat Express electronic bat detector - arrow shows direc}on of microphone

Bat surveyor equipped with hand-held Pet ersson D230 electonic bat detector with ear phones

Tripod mounted FLIR thermal camera - camera fields of view and bat in night detec}on distances reported separately

Bat roost emergence survey set up 17 June 2024

Applied Ecology Ltd

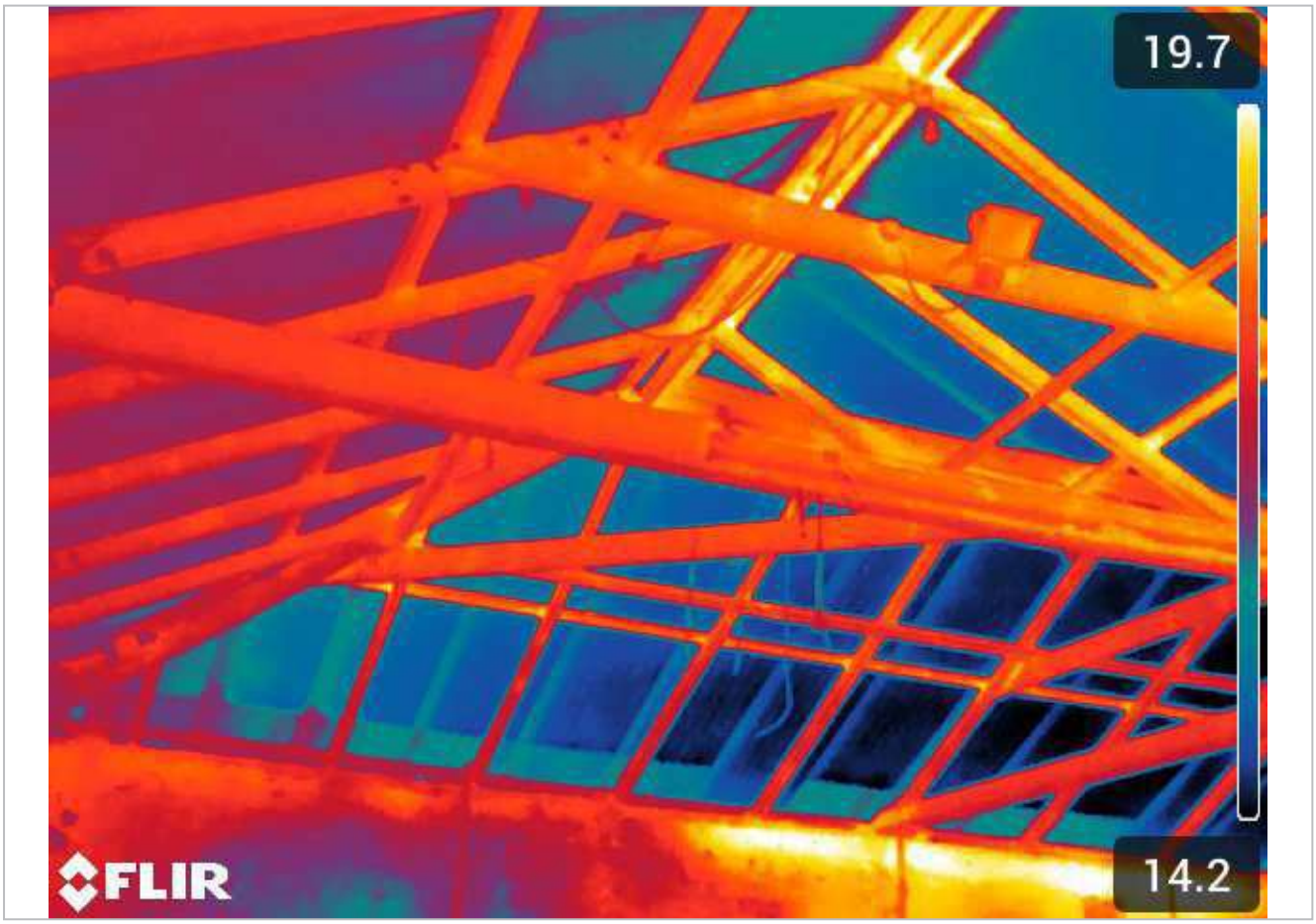


FLIR T860 (640 x 480 pixel resolu}on) with 42 degr ee lens = bat in night detec}on dis tance of 66 m.
Camera located 23 m from furthest point of building

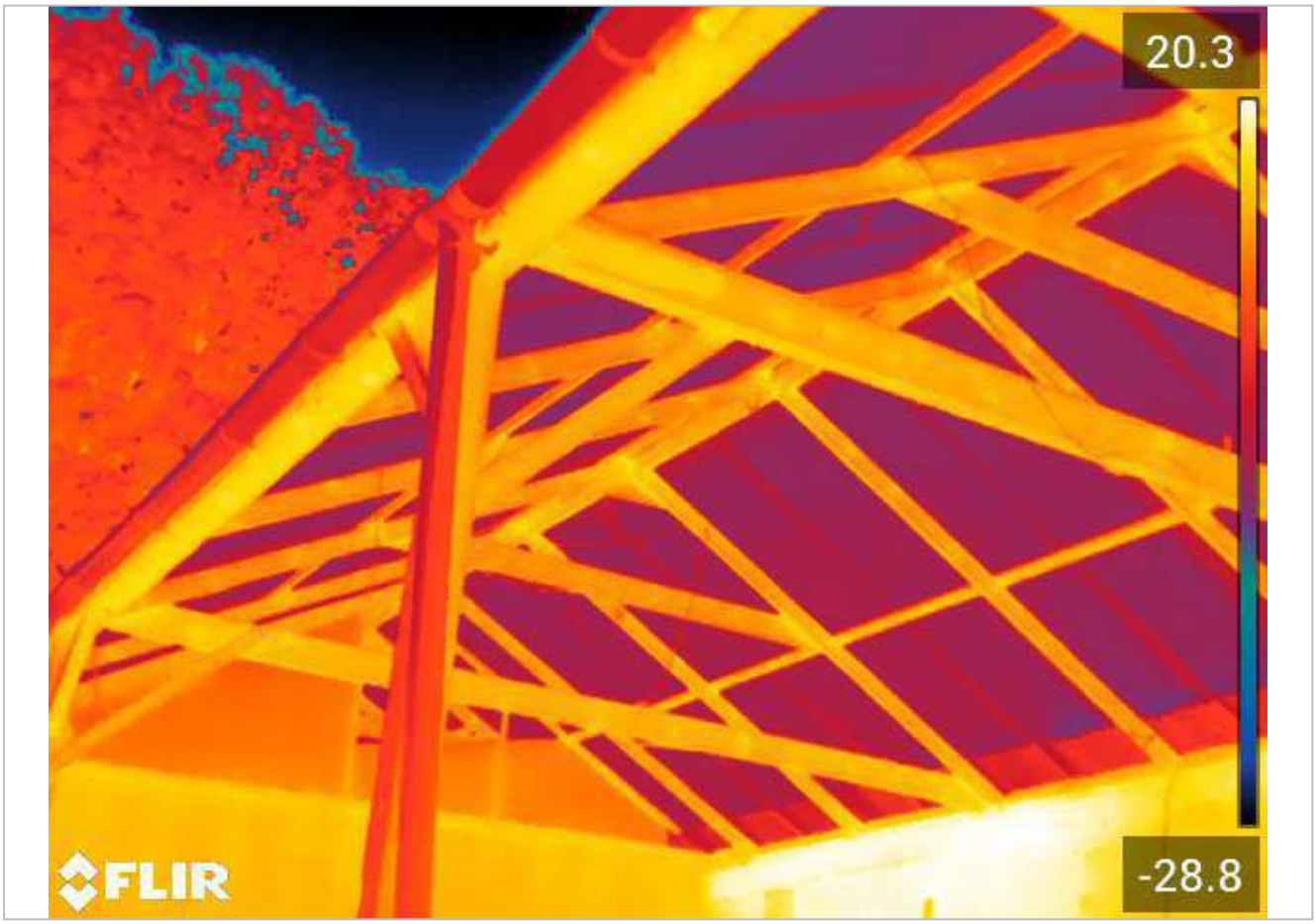
FLIR T1020 (1024 x 768 pixel resolu}on) with 45 degr ee lens = bat in night detec}on dis tance of 104 m. Camera located 35 m from furthest point of building

FLIR T540 (464 x 348 pixel resolu}on) with 42 degr ee lens = bat in night detec}on dis tance of 51 m.
Camera located 26 m from furthest point of building

FLIR T1020 (1024 x 768 pixel resolu}on) with 45 degr ee lens = bat in night detec}on dis tance of 104 m. Camera located 24 m from furthest point of building



FLIR T540 (464 x 348 pixel resolu}on) with 42 degr ee lens = bat in night detec}on dis tance of 51 m.
Camera located 10 m from furthest point of building



FLIR T540 (464 x 348 pixel resolu}on) with 42 degr ee lens = bat in night detec}on dis tance of 51 m.
Camera located 17 m from furthest point of building

FLIR T540 (464 x 348 pixel resolu}on) with 42 degr ee lens = bat in night detec}on dis tance of 51 m.
Camera located 19 m from furthest point of building

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APPENDIX 5
TRANSPORT TECHNICAL NOTE

TECHNICAL NOTE

RIDGE

TRITAX PARK, CAMBRIDGE

VERSION	DATE	PROJECT NUMBER AND NAME	CREATED BY	REVIEWED BY
2.0	29.01.2026	5030488 – Tritax Park, Cambridge	J. Santos	J. Duffy

1. INTRODUCTION

1.1.1. Ridge and Partners LLP have been appointed by Tritax Big Box Developments Limited (hereafter referred to as 'Tritax') to provide a transport and highways Technical Note (TN) in support of a Regulation 18 consultation for a proposed employment development on Tritax Park, Cambridge (Land north of the A14, Bar Hill), hereafter referred to as 'subject site'.

1.1.2. This TN should be read in conjunction with the Regulation 18 Consultation representations prepared by Bidwells LLP in relation to Tritax Park, Cambridge, of which this note is appended.

1.1.3. Tritax Park has been assessed under Housing and Economic Land Availability Assessment (HELAA) Site ID 40121 and 40244. HELAA Site ID 40121.

1.1.4. Tritax have entered into a Planning Performance Agreement (hereafter referred to as 'PPA', LPA Reference: PPA/25/0034) with Greater Cambridge Shared Planning Services to support pre-application discussions relating to land at Tritax Park, Cambridge. There has also been an Environmental Impact Assessment Scoping Opinion (hereafter referred to as 'EIA') submitted on the site (LPA Reference: 25/03990/SCOP) of up to 235,5000 sqm of Warehousing and Distribution space with ancillary use.

1.1.5. Tritax is bringing forward proposals for Tritax Park, Cambridge, a state-of-the-art logistics and advanced manufacturing park located to the north of Bar Hill, in close proximity to the A14 (Junction 25). The proposed development will provide essential infrastructure to support the efficient and reliable movement of goods, respond to evolving supply chain demands, and deliver significant economic benefits at a local and sub-regional level

1.1.6. This TN establishes an additional evidence base to support the HELAA scoring for the subject site. Through an evaluation of the site access, transport infrastructure, and highway connectivity, this document demonstrates that the merits of the subject site warrant an upward revision of its current HELAA score.

1.1.7. Additionally, this TN provides a comparative analysis against 'Slate Hall Farm,' a nearby site being promoted separately. This comparison highlights the technical differences between the two locations, specifically demonstrating this site's integration with the local road network and its sustainability credentials.

2. TECHNICAL NOTE POINT

2.1. Site Access

2.1.1. Vehicular access to the subject site will be made via the B1050 to the east, which is the primary link road feeding directly into the Bar Hill Junction (Junction 25). Accessing both the A14 southeast bound and northwest bound is therefore highly efficient from the site as it sits at the immediate approach of the interchange, and can therefore appropriately deal with the level of HGV traffic associated with the proposed form of development directly to and from the Strategic Road Network (SRN). This is important given the specific locational requirement of this sector of employment that require direct access to higher order roads for HGV's which in turn minimises local road impact. It is noted that the consultation draft of the NPPF includes the following statement in section E3 relating to Freight and logistics:

"To support the effective and efficient movement of goods, development proposals for freight and logistics uses and associated infrastructure should:

…

*Be **sited [Ridge emphasis]** and designed **to limit environmental impacts [Ridge emphasis]** (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time activity will be required*

…"

2.1.2. Traffic from the subject site is strategically managed to utilise both the Strategic Road Network (SRN) and the A1307. All HGV traffic is anticipated to route directly onto the A14 via the Bar Hill Junction slip roads. Whilst the majority of staff traffic is also anticipated to utilise the A14, a smaller proportion of employee vehicles will use the A1307 local access road toward Cambridge or Huntingdon. This provides "all-movements" flexibility and higher capacity compared to constrained, village-linked routes, whilst the site's integration into this network further supports the viability of the sustainable and active travel modes detailed later in this report.

2.1.3. Comparatively, Slate Hall Farm situated further east, is likely restricted to vehicular access via the A1307 or Dry Drayton Road. Whilst access to the Bar Hill Interchange is feasible, it is inherently more convoluted. Following the A14 upgrade works, the previous Dry Drayton/Oakington A14 intersection was removed, meaning traffic from Slate Hall Farm must navigate a longer journey via the local network to reach the strategic interchange, increasing journey times and travel distances when compared to the more direct connection available at the subject site.

2.1.4. The Slate Hall Farm site would need to link through two sets of traffic lights from the A1307 to access the B1050 on route to the A14. These connecting junctions have only limited turning lane length and therefore proposals that rely on these junctions to access the primary routing would likely create further traffic impact when compared with that of the site promoted by Tritax, which allows more direct access to the A14. The need for efficient access is of particular relevance in consideration of Cambridgeshire's own wording relating to Transport and Roads when commenting on the Slate Hill Farm site which states the following:

"…There are constraints, which mean that additional required capacity cannot be easily implemented hence the reliance on the reduction of car trips through modal shifts to public and active travel, which do not yet have the appropriate infrastructure. Robust mitigation, Transport Assessment and Travel Plan work will be required."

2.1.5. Furthermore, the available access routes for Slate Hall Farm are more heavily influenced by the residential environments of Dry Drayton and Oakington. In contrast to the subject site, which utilises the primary B1050 and A1307 corridors, routes available to Slate Hall Farm are less suited for high-volume employment-led traffic, as its routing conflicts with local village "place" functions.

2.2. Transport and Roads (Public Transport and Active Travel)

2.2.1. Bus services 55 and 55A currently route along the subject site's frontage. It is technically feasible to divert these services into the site to ensure high levels of internal permeability, allowing direct access into the site, actively promoting modal shift in line with National Planning Policy Framework (NPPF) (December 2024, updated February 2025) Paragraph 115.

2.2.2. Conversely, Slate Hall Farm is fundamentally constrained by lack of frontage bus provision. The nearest available stops at 'Bar Hill Superstore' and 'Bar Hill Acorn Avenue' are located approximately 1km and 770m from the site, respectively. Consequently, the subject site offers a more deliverable solution pertaining access to bus services, which would warrant a higher score within the HELAA transport and accessibility matrix compared to the Slate Hall Farm draft allocation. This is of particular relevance given Cambridgeshire's

comment made on the Slate Hall Farm site, in relation to Transport and Roads as set out above, specifically references the need to encourage mode shift and it is evident that the Tritax site has more opportunity to deliver public transport connection through a simpler and more direct approach.

2.2.3. The subject site is well positioned to deliver high-quality active travel infrastructure that directly aligns with the objectives of the Local Cycle and Walking Infrastructure Plan (LCWIP). The site frontage allows for the delivery of segregated walking and cycling facilities designed to LTN 1/20 standards, providing safe, and direct links toward Northstowe.

2.2.4. In contrast, the active travel strategy for Slate Hall Farm when accessing Northstowe is heavily reliant on Bridleway 151/10, which traverses the site. Upgrading a Public Right of Way (PRoW) to a standard suitable for both cycling and walking presents significant deliverable risks, including public consultation, potential legal challenges under the Highways Act 1980, and potential third-party land requirements in order to achieve LTN 1/20 compliant widths. This distinction should be reflected in the HELAA scoring matrix, where the subject site demonstrates a clear "Green" status for active travel in alignment with local policy, compared to the "Amber" status of Slate Hall Farm.

3. SUMMARY

3.1.1. Ridge and Partners LLP have been appointed by Tritax Big Box Developments Limited to provide a transport and highways TN in support of a Regulation 18 consultation for a proposed employment site at land to the north of Bar Hill at Junction 25 of the A41, Cambridgeshire.

3.1.2. This TN demonstrates that the subject site outperforms the nearby Slate Hall Farm site across all key transport criteria. It offers direct strategic network access, superior integration with existing public transport corridors, and a clearer path to delivering LTN 1/20 compliant active travel infrastructure.

3.1.3. These merits warrant a formal upward revision of the HELAA scoring matrix for the subject site. Whilst Slate Hall Farm faces significant "Amber" risks regarding deliverability of active travel infrastructure and guidance thresholds, the subject site provides "Green" solutions that align more effectively with both local and national planning policy.

APPENDIX 6
BEEHIVE REDEVELOPMENT APPEAL DECISION (PINS REFERENCE: 3360616)

Ministry of Housing,
Communities &
Local Government

Our ref: APP/Q0505/V/25/3360616
Your ref: 23/03204/OUT

Caroline Bywater & Peter Seaborn
Mills and Reeve
Botanic House
100 Hills Road
Cambridge, CB2 1PH

9 December 2025

Sent by email only

Dear Caroline Bywater and Peter Seaborn

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
APPLICATION MADE BY RAILWAY PENSION NOMINEES LTD (RAILPEN)
THE BEEHIVE CENTRE, COLDHAMS LANE, CAMBRIDGE, CB1 3ET
APPLICATION REF: 23/03204/OUT

This decision was made by the Parliamentary Under-Secretary of State for Building Safety, Fire and Democracy, Samantha Dixon MP, on behalf of the Secretary of State

1. I am directed by the Secretary of State to say that consideration has been given to the report of Jonathan Bore MRTPI, who held a public local inquiry which opened on 24 June 2025 into your client's outline application (with all matters reserved) for planning permission 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, in accordance with application Ref. 23/03204/OUT, dated 14 August 2023.

2. On 12 February 2025, this application was called in for the Secretary of State's determination, in pursuance of Section 77 of the Town and Country Planning Act (TCPA) 1990, that your client's application be referred to him instead of being dealt with by the local planning authority, Cambridge City Council.

Inspector's recommendation and summary of the decision

3. The Inspector recommended that the application be approved, and planning permission granted, subject to conditions.

4. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions, except where stated, and agrees with his recommendation. He has decided to approve the application and grant planning permission, subject to conditions. The

Ministry of Housing Communities & Local Government Email: PCC@communities.gov.uk
Laura Webster, Decision Officer
Planning Casework Unit
3rd Floor Fry Building
2 Marsham Street
London SW1P 4DF

Inspector's Report (IR) is attached. All references to paragraph numbers, unless otherwise stated, are to that report.

Environmental Statement

5. In reaching this position, the Secretary of State has taken into account the Environmental Statement which was submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the Environmental Statement Addendum (IR5.1-5.2). Having taken account of the Inspector's comments at IR5.3, the Secretary of State is satisfied that the Environmental Statement and other additional information provided complies with the above Regulations and that sufficient information has been provided for him to assess the environmental impact of the proposal.

Matters arising since the close of the inquiry

6. A list of representations which have been received since the inquiry is at Annex A. The Secretary of State is satisfied that the issues raised do not affect his decision, and no new issues were raised in this correspondence to warrant further investigation or necessitate additional referrals back to parties. Copies of these letters may be obtained on request to the email address at the foot of the first page of this letter.

Policy and statutory considerations

7. In reaching his decision, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act (PCPA) 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

8. In this case the development plan consists of Cambridge Local Plan (CLP) (adopted October 2018), and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) (adopted July 2021). The Secretary of State considers that relevant development plan policies include those in the documents referred to at IR6.3.

9. Other material considerations which the Secretary of State has taken into account include the National Planning Policy Framework (the Framework) published on 12 December 2024 and updated on 7 February 2025, and associated planning guidance (the Guidance), and the documents at IR6.5-6.7.

Emerging plan

10. The emerging plan comprises the Greater Cambridge Joint Local Plan, which is being prepared jointly by Cambridge City Council and South Cambridgeshire District Council. This had reached Regulation 18 stage at the time of the inquiry, and public consultation was being undertaken at the time of this decision. The Secretary of State notes that the parties agree it carries very limited weight in decision-making (IR6.4).

11. Paragraph 49 of the Framework states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework. The emerging Greater Cambridge Joint Local Plan is at an early stage of preparation. In accordance with paragraph 49 of the Framework, the Secretary of State agrees with parties that only very limited weight can be given to this plan.

Main issues

Economic growth and employment

12. For the reasons given at IR13.1-13.5 and IR13.59-13.63, the Secretary of State agrees that the scheme would create enhanced provision for an internationally important cluster of knowledge and high technology industries (IR13.5). He further agrees that it would promote economic growth in a sustainable and accessible location and facilitate innovation and research and knowledge-based industry (IR13.62). He further agrees that the scheme would accord with Policy 2 and also Policy 40 of the CLP which focus employment development on the urban area and the city centre, and support employment proposals in sustainable locations and new business space in areas where there is strong demand (IR13.63). The Secretary of State considers benefits relating to the proposal's support for economic growth and productivity in the Greater Cambridge area should be given significant weight.

13. The Secretary of State has considered the position on need, taking into account the evidence agreed between the main parties at IR7.4-7.15. He agrees with the Inspector that there is a significant level of demand for wet lab space and scale-up space that is not matched by current commitments, and the shortfall may remain until the end of the local plan period (IR13.2). He has also considered the opposing view, with reference to the Iceni report[1], that there is less need for office and dry lab space. Unlike the Inspector at IR13.62, the Secretary of State does not consider that on the evidence before him he is able to accurately determine need for the development, given uncertainties in the delivery pipeline against commitments and demand. The Secretary of State therefore does not give separate weight to need.

14. The Secretary of State notes that the scheme would create an estimated 6,445 direct jobs and agrees with the Inspector that this would be a very big increase over the Beehive Centre's existing 855 jobs (670 full time equivalent) (IR13.4[2]). He further agrees that strategies for employment and skills, community outreach and start up and scale up, which are included in the s.106 agreement, would also enhance local opportunities for employment and training and agrees the scheme would deliver significant social value (IR13.4). The Secretary of State considers the benefits in terms of employment and social value arising from employment should be given significant weight.

Vitality of town centres

15. For the reasons given at IR13.6-13.10 and IR13.65-13.66, the Secretary of State agrees that the retail park does not enjoy policy protection and, although large format retailing would be lost, there would be adequate retail provision both in the surrounding area and in the form of a new local centre created on the site (IR13.65). The Secretary of State notes that the retail park would be replaced by a local centre of a little over 5,000 square metres, and agrees that this would provide convenience and comparison floorspace and restaurants and cafes for local people and workers in the new development (IR13.7). He further agrees it would provide opportunities for small convenience shopping that would also be of value to local people (IR13.8). The Secretary of State agrees with the Inspector the scheme would not adversely affect the vitality or viability of any town centre, and that it would be consistent with Government policies in Chapter 7 of the Framework for ensuring the vitality of town centres (IR13.10). He further agrees the scheme would be

[1] The Greater Cambridge Growth Sectors Study September 2024, as referred at IR7.6
[2] This refers to an unnumbered paragraph directly following IR13.4

in accordance with CLP Policy 6 (IR13.65). The Secretary of State considers that benefits relating to convenience retail provision for the local community should be given moderate weight.

16. For the reasons given at IR13.9 and 13.66 the Secretary of State agrees there would a partial conflict with CLP Policy 73 through the loss of the swimming pool and gym from the site.

Design

Urban design and transport

17. For the reasons given at IR13.12-13.16 and IR13.52 the Secretary of State agrees that the site currently is dominated by motor vehicles, that it has little sense of place or enclosure and no local distinctiveness, and that it does not represent a very efficient use of urban land (IR13.12). He further agrees that the scheme would bring about a great improvement in its character, appearance and intensity of use, and would support local facilities and transport networks (IR13.12).

18. The Secretary of State agrees that land uses, access and circulation, landscape and open space and maximum building heights and plots would all be effectively controlled by the parameter plans and by the Design Code, the latter being a requirement of Condition 3 (IR13.13). He further agrees that the Design Code would ensure that the buildings would be of high quality (IR13.15). He further agrees that the parameter plans and Design Code are comprehensive and embody the qualities of good urban design, create a distinctive place, contain well-designed spaces with animated streets and active street frontages (13.52).

19. The Secretary of State agrees that the development would remove the current car-dominated development in favour of a scheme that would promote sustainable and active travel, and that the development would be accessed from Coldhams Lane through a new pedestrian and cycle friendly junction which would provide a better public realm (IR13.16). He further agrees that the addition of a number of pedestrian and cycle routes would assist in integrating the development with the movement pattern of its surroundings, and that there would be improved bus services (IR13.16). The Secretary of State considers benefits relating to sustainable transport should be given moderate weight.

Townscape and heritage

20. For the reasons given at IR13.17-13.19, IR13.53 and IR13.70, the Secretary of State agrees that while the scheme would break the skyline when seen from Castle Hill Mound, the overall impact on that viewpoint would be small (IR13.19), and that it would not appear obtrusive in views from Castle Mound or other vantage points such as Redmeadow Hill (IR13.53). He further agrees that the parameter plan and Design Code would ensure that the development was divided visually into separate parts, that the mass was broken up through varied elevational design and material tones, and that an interesting roof profile was created, thus reducing the scheme's perceived bulk. Overall, he agrees that the scheme would be assimilated successfully into the wider townscape, and would not harm the townscape of wider Cambridge (IR13.19). He considers that the harm to townscape arising from the impact from Castle Hill Mound should be given limited weight.

21. For the reasons given at IR13.20-13.26, IR13.53 and IR13.70, the Secretary of State agrees that from public viewpoints there is little intervisibility between the application site and Mill Road Conservation Area, apart from a limited view at the corner of York Street and Ainsworth Street, and that the new buildings would not overtop the roofs of the existing housing when seen from the streets themselves (IR13.20). He further agrees that there would be a small degree of harm to the conservation area's significance arising from the proximity of the proposed development and the change of scale, but this would be at the lower end of less than substantial (IR13.21).

22. The Secretary of State notes that the Applicant's Heritage Assessment identified less than significant harm to five other heritage assets: Christ Church in Newmarket Road Grade II Listed), Jesus College Chapel (Grade I), All Saints Church in Jesus Lane (Grade I), Castle and Victoria Road Conservation Area, and the Central Cambridge Conservation Area (IR13.22). The Secretary of State agrees that the site itself is not especially physically close to any of these assets (IR13.22). He has taken into account the Inspector's analysis that the Heritage Assessment and the Applicant's expert heritage witness concluded that there would have a "negligible adverse" effect on the six assets identified by the Applicant, and that the Council assessed the impact to be greater, though still less than substantial (IR13.24). He further agrees that the proposal would be in accordance with CLP Policy 60 which relates to tall buildings and the Cambridge skyline, and policies 61 and 62 which relates to heritage (IR13.70). Overall, the Secretary of State concludes that there would be less than substantial harm at a low level to the significance of the Mill Lane Conservation Area, and at a very low level to the significance of Christ Church in Newmarket Road, Jesus College Chapel, All Saints Church in Jesus Lane, Castle and Victoria Road Conservation Area, and the Central Cambridge Conservation Area.

23. In line with paragraph 212 of the Framework, the Secretary of State considers that the harm to the designated heritage assets considered at paragraphs 21 and 22 above carry great weight. The Secretary of State has undertaken the balancing exercise under paragraph 215 of the Framework at paragraph 36 below.

24. For the reasons given at 13.25-13.26 and IR13.70, the Secretary of State agrees with the Inspector's conclusions on the Porcelanosa building, and does not give any weight to its loss.

Residential amenity

25. For the reasons given at IR13.27-13.51, IR13.54-13.58 and IR13.67-13.69, the Secretary of State agrees that that if it were possible to build the scheme to the maximum building envelopes shown on the parameter plans, a substantial number of windows and habitable rooms would fail against the Building Research Establishment (BRE) Guidance[3], with many examples of major reductions in daylight and low retained Vertical Sky Component (VSC) values (IR13.55). However, he has taken into account that the buildings could not be built out everywhere to the maximum envelopes shown on the parameter plans and that the parameter plans and the Illustrative Scheme are not alternatives; the Illustrative Scheme is indicative of how a scheme might come forward in compliance with the controls exerted by the parameter plans and Design Code (IR13.29). Like the Inspector at IR13.54, the Secretary of State considers that the Illustrative Scheme demonstrates that the parameter plans and Design Code can work together to produce a successful scheme that would be acceptable in its impacts on neighbouring

[3] CD8. 01

homes in respect of daylight, sunlight, overshadowing and outlook. He agrees that the BRE Guidelines would still be breached in a number of instances but notes that some of the reductions in VSC arise from the fact that much of the site is currently very open and that conditions will of necessity change to make the best use of this urban brownfield site (IR13.54).

26. The Secretary of State agrees that the Illustrative Scheme demonstrates that an acceptable development can be built within the terms of the outline planning application (IR13.56). The Secretary of State notes that, at the inquiry, the main parties came to an agreement over the wording of a condition which was aimed at ensuring that the daylight, sunlight and overshadowing effects of any reserved matters proposal would be no greater than those modelled in respect of the Illustrative Scheme (IR1.8). The Secretary of State agrees with the Inspector that the condition is necessary, because it would provide a degree of certainty for those who are concerned about the potential impact of the eventual scheme (IR13.57). It is included as Condition 6 in Annex B to this decision letter. He further agrees with the Inspector's conclusion that even under the Illustrative Scheme residents whose homes back closely on to the site would experience a substantial adjustment in their rear aspect in daylight levels, scale and outlook (IR13.58). The Secretary of State considers the harm to residential amenity should be given significant weight.

Overall conclusion on design

27. Further to the Secretary of State's considerations above at paragraphs 17–26, and for the reasons given at IR13.12-13.58 and IR13.67-13.69 the Secretary of State agrees with the Inspector that the scheme would make much better and more intensive use of an urban site and overall, as a neighbour, it would be a much better designed development than the current Beehive Centre (IR13.58). He further agrees that the design strategy set out in the Design and Access Statement, and the controls exerted by the parameter plans and the Design Code, would combine to create a successful place based on good urban design principles, and that it accords with CLP Policies 55, 56, 57 and 59 which relate to design (IR13.69). The Secretary of State considers that benefits relating to design and placemaking should be given moderate weight.

<u>Other matters</u>

28. Having regard to the Inspector's findings at IR13.4, IR13.52 and IR13.73, the Secretary of State agrees the scheme would make the best use of this urban brownfield site (IR13.52). The Secretary of State considers that the benefits of making efficient use of a brownfield site should be given significant weight.

29. Having regard to the Inspector's findings at IR13.64, the Secretary of State agrees that there is nothing in the plan that would actually require residential development to be included on the site and the scheme would not conflict with Policy 3 in respect of the spatial strategy for housing.

30. Further to the Secretary of State's considerations above at paragraphs 11-28, and having regard to the Inspector's findings at IR13.64 and IR13.71-13.72, the Secretary of State agrees that the proposal would accord with the development plan as a whole.

Planning conditions

31. The Secretary of State has had regard to the Inspector's analysis at IR12.1-12.16, the recommended conditions set out at the end of the IR and the reasons for them, and to national policy in paragraph 57 of the Framework and the relevant Guidance. He is satisfied that the conditions recommended by the Inspector comply with the policy test set out at paragraph 57 of the Framework and that the conditions set out at Annex B should form part of his decision.

Planning obligations

32. The Secretary of State has had regard to the Inspector's analysis at IR12.17-12.34, the planning obligation dated 2 July 2025, paragraph 58 of the Framework, the Guidance and the Community Infrastructure Levy (CIL) Regulations 2010, as amended. For the reasons given at IR12.17-12.34, he agrees with the Inspector's conclusion that the obligation complies with Regulation 122 of the CIL Regulations 2010 and the tests at paragraph 58 of the Framework.

Planning balance and overall conclusion

33. For the reasons given above, the Secretary of State considers that the application is in partial conflict with CLP Policy 73 of the development plan, but is in accordance with the development plan overall. He has gone on to consider whether there are material considerations which indicate that the proposal should be determined other than in line with the development plan.

34. Weighing in favour of the proposal are economic growth and productivity in the Greater Cambridge area, employment benefits and derived social value, and efficient use of a brownfield site, which each carry significant weight; and community benefits, design and placemaking, and sustainable transport which each carry moderate weight.

35. Weighing against the proposal are harm to residential amenity which carries significant weight; less than substantial harm to the settings of designated heritage assets which carries collective great weight; and townscape impacts which carry limited weight.

36. In line with the heritage balance set out at paragraph 215 of the Framework, the Secretary of State has considered whether the identified 'less than substantial' harm to the significance of the designated heritage assets is outweighed by the public benefits of the proposal. Taking into the account the public benefits of the proposal as identified in this decision letter, overall the Secretary of State considers that the benefits of the appeal scheme are collectively sufficient to outbalance the identified 'less than substantial' harm to the significance of Mill Road Conservation Area, Christ Church in Newmarket Road, Jesus College Chapel, All Saints Church in Jesus Lane, Castle and Victoria Road Conservation Area, and the Central Cambridge Conservation Area. He considers that the balancing exercise under paragraph 215 of the Framework is therefore favourable to the proposal.

37. Overall, in applying s.38(6) of the PCPA 2004, the Secretary of State considers that the accordance with the development plan and the material considerations in this case indicate that permission should be granted.

38. The Secretary of State therefore concludes that the application should be approved, and planning permission granted, subject to conditions.

Formal decision

39. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. He hereby grants outline planning permission (with all matters reserved) subject to the conditions set out in Annex B of this decision letter 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, in accordance with application ref 23/03204/OUT, dated 14 August 2023.

40. This letter does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than section 57 of the TCPA 1990.

Right to challenge the decision

41. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged. This must be done by making an application to the High Court within 6 weeks from the day after the date of this letter for leave to bring a statutory review under section 288 of the TCPA 1990.

42. An applicant for any consent, agreement or approval required by a condition of this permission for agreement of reserved matters has a statutory right of appeal to the Secretary of State if consent, agreement or approval is refused or granted conditionally or if the Local Planning Authority fail to give notice of their decision within the prescribed period.

43. A copy of this letter has been sent to Cambridge City Council, and notification has been sent to others who asked to be informed of the decision.

Yours faithfully

Laura Webster

Decision officer

This decision was made by Parliamentary Under-Secretary of State for Building Safety, Fire and Democracy, Samantha Dixon MP, on behalf of the Secretary of State, and signed on her behalf

Annex A - Schedule of Representations

General representations

Party	Date
Railpen Pension Nominees Ltd	12 November 2025
Railpen Pension Nominees Ltd	13 November 2025

Annex B List of conditions

1. No development on any phase shall commence until details of the appearance, means of access, landscaping, layout and scale, (hereinafter called the 'reserved matters') for that phase have been submitted to and approved in writing by the local planning authority. The development of each phase shall be carried out as approved.

2. Application(s) for approval of the reserved matters for any phase shall be made to the local planning authority before the expiration of ten years from the date of this permission. The development of each phase hereby permitted shall be begun before the expiration of three years from the date of approval of the last of the reserved matters of that phase to be approved.

3. The development hereby permitted shall be carried out in accordance with the approved documents, as listed below, save for where such details are superseded by further details being submitted to and approved in writing by the local planning authority pursuant to the conditions attached to this permission.

    - PO - LDA - ZZ - XX - DR - A – 08000 REV P2 (Site Location Plan)
    - PO - LDA - ZZ - XX - DR - A – 08003 REV P2 (Maximum Building Heights & Plots)
    - PO - LDA - ZZ - XX - DR - A – 08004 REV P2 (Land Use – Ground Floor)
    - PO - LDA - ZZ - XX - DR - A – 08005 REV P2 (Land Use – Upper Floors)
    - PO - LDA - ZZ - XX - DR - A – 08006 REV P2 (Access and Circulation)
    - PO - LDA - ZZ - XX - DR - A – 08007 REV P2 (Landscape and Open Space)
    - Design Code (Leonard Design Architects, dated November 2024).

4. The proposed maximum floorspace of all land uses indicated (including any basements and external bin/cycle stores) shall not exceed a total of 166,685 sqm (gross external area).

5. Prior to or concurrently with the submission of the first of the reserved matters application(s) for any phase of the development, a site wide phasing plan for the development hereby permitted shall be submitted to and approved in writing by the local planning authority. The site wide phasing plan shall identify all phases of the development and the sequence in which they will be developed and shall include a mechanism for its review and amendment. The development shall be carried out in accordance with the approved details.

6. Each reserved matters application shall be accompanied by a report which tests the daylight, sunlight and overshadowing effects of each building to which the reserved matters application relates in accordance with the relevant BRE Guidance: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (BR209 2022 Edition).

    Each such report shall set out the impacts on each identified window and room of all receptor properties and their gardens identified in the Illustrative Scheme results for VSC, NSL, APSH, Winter PSH and BRE 2-hour sunlight test (on 21 March), as set out in tables within appendices 2b, 3b, 4b and 5 to the daylight, sunlight and overshadowing evidence prepared by eb7 and dated 27 May 2025 (the eb7 Appendices). It shall include

a full pack of neighbouring window referencing and NSL contour plots for room layout interpretation including neighbouring property reference locators.

Each report shall use the baseline and arrangement of neighbouring properties on which the results in the eb7 Appendices were derived and also take into account the effects of any other building(s) which have been granted reserved matters approval and, for any plots that have not, the footprint and position of the buildings shown for that plot on the Illustrative Masterplan PO-LDA-ZZ-XX-DR-A-08010 Rev P2.

The daylight, sunlight and overshadowing effects of the development shall not amount to any greater Vertical Sky Component loss, No-Sky Line loss, Annual Probable Sunlight Hours loss, Winter Probable Sunlight Hours loss or BRE 2-hour sunlight test loss on 21 March to any of the identified windows and rooms of receptor properties, or their gardens, than those identified in the eb7 Appendices.

7. Prior to commencement of development on any phase (other than site investigation, archaeological works and enabling works to make the site ready for construction), cross sections showing the finished floor levels of all proposed buildings and associated external landscaping within that phase in relation to the existing and proposed ground levels of the surrounding land and buildings shall be submitted for approval to the local planning authority. The development shall be constructed in accordance with the approved details.

8. Prior to the commencement of development on any phase (other than site investigation, archaeological works and enabling works to make the site ready for construction), a demolition and construction environmental management plan for that phase shall be submitted to and approved in writing by the local planning authority. The development of each phase shall be undertaken in accordance with the approved plan.

9. Demolition and construction, and deliveries for those purposes, shall be carried out only between 0800 hours to 1800 hours Monday to Friday, and 0800 hours to 1300 hours on Saturday and at no time on Sundays, Bank or Public Holidays, unless the local planning authority gives written consent to any variation.

10. Any reserved matters application for a phase or building containing plant or equipment likely to generate external noise affecting noise-sensitive premises both within and beyond the site boundary shall be accompanied by a noise assessment for approval by the local planning authority. The noise assessment shall contain details of mitigation measures to be carried out in respect of the noise source and where necessary and appropriate the insulation of the buildings against external noise. The approved details shall be implemented before the relevant phase or building is occupied and shall be retained thereafter in accordance with the approved details.

11. Any reserved matters application for a phase which includes space that is intended to be used for outdoor events likely to generate noise shall include a plan for the approval of the local planning authority containing details for the management and mitigation of such noise to minimise disturbance to nearby noise sensitive premises. The approved details shall be implemented from the first occupation of the relevant phase and maintained thereafter.

12. Reserved matters applications for each phase shall include a scheme for approval by the local planning authority for external and internal artificial lighting within that phase. The scheme shall be designed to minimise light pollution and disturbance to residential properties. The details shall be accompanied by an artificial lighting impact assessment. Each approved lighting scheme shall be fully installed, maintained and operated in accordance with the approved scheme.

13. Prior to the use of any commercial floorspace in which fumes or odours are emitted, details of a scheme for the extraction and filtration of such fumes and odours shall be submitted to and approved in writing by the local planning authority. The scheme shall be fully installed, maintained and operated in accordance with the approved details prior to the premises being brought into use.

14. No laying of services, creation of hard surfaces or erection of buildings shall commence on any phase until a detailed design for the surface water drainage for that phase, including a timetable for implementation and full details of maintenance and adoption, has been submitted to and approved in writing by the local planning authority. The submitted details shall be based upon the principles within Flood Risk Assessment and Drainage Strategy Appendix 8.1A (October 2024). The surface water drainage works shall be carried out in accordance with the approved details for that phase. Any elements of the surface water drainage system within that phase that are not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved maintenance details. An independent report from an appropriately qualified person shall be submitted to the local planning authority on completion of each phase and before its occupation, confirming that the surface water drainage system has been installed in accordance with the approved details.

15. No development of any phase, other than site investigation, shall commence until the following have been submitted to and approved in writing by the local planning authority in relation to that phase:

    - a site investigation strategy in respect of contamination risk based upon the findings of the Preliminary Risk Assessment ref: WIE17469-100-R-5-3-1-PRA, dated July 2024 and the Preliminary Generic Quantitative Risk Assessment, ref: WIE17469-100-R-12-1-2-GQRA, dated February 2023;
    - an intrusive site investigation report; and
    - a remediation strategy.

    The development of each phase shall be undertaken in accordance with the agreed remediation strategy and no occupation of that phase shall take place until a report has been submitted to and approved in writing by the local planning authority demonstrating compliance with the approved remediation strategy. If unexpected contamination is encountered during the development works which has not previously been identified, all works on the relevant phase shall cease immediately and shall not recommence until an intrusive site investigation report and a remediation strategy specific to the newly discovered contamination have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved intrusive site investigation report and remediation strategy.

16. No demolition or development in any phase shall commence until a programme of archaeological work has been undertaken for that phase in accordance with a written scheme of investigation that has been submitted to and approved in writing by the local planning authority.

17. No development above ground level, other than demolition, in any phase shall commence until a hard and soft landscaping scheme for that phase, including long term maintenance and management responsibilities, has been submitted to and approved in writing by the local planning authority. Hard and soft landscaping works within each phase shall be carried out and maintained in accordance with the approved landscaping details. If within a period of ten years from the date of the planting, any tree or plant is removed, uprooted or destroyed or dies, it shall be replaced within the next planting season by another equivalent tree or plant of the same species and size.

18. Prior to the commencement of development, a site wide biodiversity gain plan shall be submitted to and approved in writing by the local planning authority which shall include the strategic approach to securing a minimum 20% net gain in biodiversity on-site, using the most up to date DEFRA metric.

19. No development shall commence on any phase until a biodiversity gain plan for that phase, which shall be generally in accordance with the site wide biodiversity gain plan, has been submitted to and approved in writing by the local planning authority. The phase biodiversity gain plan shall set out the detailed biodiversity net gain requirements for that phase together with details of implementation, management and monitoring for a period of 30 years for significant habitat enhancements, on-site and off-site as appropriate. Measures for biodiversity gain plan in each phase shall be implemented in full in accordance with the approved plan.

20. Details of the design and maintenance of any biodiverse roof, including the control of access thereto, shall be submitted to and approved in writing by the local planning authority before development of that building above ground level.

21. All reserved matters applications for buildings shall be accompanied by a sustainability statement and an energy statement which shall have regard to the targets and commitments set out within the submitted Sustainability Strategy, Revision 01 (16 August 2024), and the submitted Energy Strategy, Revision 01 (August 2024). The sustainability statement shall be accompanied by a BREEAM pre-assessment for approval by the local planning authority which shall demonstrate that all buildings to which the reserved matters application relates are capable of achieving a minimum of BREEAM excellent with at least 5 credits for Wat01, save that:

    - the pre-assessment shall show that any office floorspace within the reserved matters area shall be capable of achieving BREEAM outstanding with at least 5 credits achieved for Wat01; and
    - the BREEAM requirement shall not relate the multi-storey car park element of Building 10.

    The development shall be carried out in accordance with the approved details.

Within six months following first occupation of each building, a post construction statement shall be submitted to the local planning authority confirming that the water efficiency provisions relating to that building as set out in relevant sustainability statement have been fully implemented, including the achievement of no less than 5 Wat01 credits.

22. No development above base course of a permanent building, excluding Building 10, shall take place until a detailed scheme for the management and recycling of grey water and/or rainwater for that building, including any necessary infrastructure, has been submitted to and approved in writing by the local planning authority. The development shall be carried out and thereafter maintained in accordance with the approved details.

23. Prior to the installation of any back-up power generator associated with the approved development, or any phase of development, details of the generator shall be submitted to and agreed in writing with the local planning authority. The details shall demonstrate that the operation of the generator will not lead to hourly exceedances of both nitrogen dioxide and particulate matter (PM10) against local air quality management objectives. The approved system shall be installed, maintained and operated in accordance with the approved details.

24. No development except for enabling works shall commence on any phase until a scheme for the on-site storage facilities for commercial waste, including waste for recycling in that phase, has been submitted to and approved in writing by the local planning authority. The approved scheme shall be carried out before the use of that phase is commenced or otherwise in accordance with a programme approved by the local planning authority for that phase and shall be retained thereafter.

25. Prior to the occupation of any phase which includes commercial buildings, a delivery, servicing and emergency vehicle management plan relating to that phase shall be submitted to and approved in writing by the local planning authority. Each such plan shall be based upon the principles within the agreed Appendix 13.4A Delivery and Servicing Plan prepared by Waterman (ref: WIE17469-100-R 6-2-1-DSP) dated August 2024 and shall include details of access arrangements, and any proposed restrictions on permitted hours for service collections / dispatches from and deliveries to the commercial units within that phase (including refuse/ recycling collections where appropriate).

    Each approved delivery, servicing and emergency vehicle management plan shall be implemented in full in accordance with the approved details.

26. All reserved matters applications for a phase which includes buildings shall be accompanied by a parking management plan for that phase, based upon the principles within the agreed Appendix 13.3A Car Parking Management Plan prepared by Waterman (ref: WIE17469-100-5-2-1-PMP) dated August 2024. Each approved phase parking management plan shall be implemented in accordance with its approved details.

27. An electric vehicle charging scheme shall be submitted to and approved in writing by the local planning authority:

- prior to the setting out of any car parking spaces within the multi-storey car park, and
- for each phase, prior to the setting out of any car parking in that phase.

The scheme shall be implemented in accordance with the approved details and maintained and retained thereafter.

28. Before any development within a phase commences (excluding enabling works), details shall be submitted to and approved in writing by the local planning authority to demonstrate that the proposed construction equipment relating to that phase shall not impair the performance of communication, navigational aids and surveillance equipment required for the safe operation of Cambridge Airport. The development of each phase shall be carried out and thereafter operated in accordance with the approved assessment.

29. Development within any phase (excluding enabling works) shall not commence until a bird hazard management plan relating to that phase has been submitted to and approved in writing by the local planning authority. The management plan shall take into account the advice in Combined Aerodrome Safeguarding Team (CAST) Advice Note 3 “Wildlife Hazards Around Aerodromes” (April 2024). Each such plan shall be implemented as approved and shall remain in force for the life of the relevant buildings.

30. No solar photovoltaic panels shall be fixed in place until a glint and glare assessment for such panels has been submitted to and approved in writing by the local planning authority. The installation, operation, and maintenance of the solar photovoltaic panels shall thereafter be in accordance with the approved assessment.

31. Development hereby permitted within the East West Rail safeguarded area (as shown on East West Rail Safeguarding Map – SG-104 drawing ref 133735-EWR-ZO-XXX-PLN-LEP-00104 dated 13 November 2024) shall not prejudice the underlying objectives of such safeguarding nor the safe operation of the railway nor the safe use by pedestrians and cyclists of the Coldhams Lane cycle bridge where it crosses the Fen Line railway.

Planning Inspectorate

Report to the Secretary of State

by Jonathan Bore MRTPI

Inspector appointed by the Secretary of State

Date: 9 September 2025

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION BY

Railway Pension Nominees Ltd (Railpen)

The Beehive Centre

Coldhams Lane

Cambridge CB1 3ET

Inquiry opened on 24 June 2025. Site visits on various occasions from 24 June to 3 July 2025.

File Ref: APP/Q0505/V/25/3360616

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LIST OF ABBREVIATIONS

TERM	DEFINITION
APSH	Annual Probable Sunlight Hours
BRE	Building Research Establishment
BREEAM	Building Research Establishment Environmental Assessment Method
NPPF	National Planning Policy Framework
NSL	No-sky Line
VSC	Vertical Sky Component
WPSH	Winter Probable Sunlight Hours

File Ref: APP/Q0505/V/25/3360616

The Beehive Centre, Coldham's Lane, Cambridge CB1 3ET

- The application was called in for decision by the Secretary of State by a direction, made under section 77 of the Town and Country Planning Act 1990, on 12 February 2025.
- The application is made by Railway Pension Nominees Ltd (Railpen) to Cambridge City Council.
- The application Ref 23/03204/OUT is dated 14 August 2023.
- The development proposed is an 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 reason given for making the direction was that the Secretary of State considered that the scheme gave rise to issues which, having regard to her policy on calling in planning applications, led her to conclude that the application should be called in.
- On the information available at the time of making the direction, the following were the matters on which the Secretary of State particularly wished to be informed for the purpose of her consideration of the application:

  a) The extent to which the proposed development is consistent with Government policies for building a strong, competitive economy in NPPF (NPPF Chapter 6);

  b) The extent to which the proposed development is consistent with Government policies for ensuring the vitality of town centres in NPPF (NPPF Chapter 7);

  c) The extent to which the proposed development is consistent with Government policies for achieving well-designed places in NPPF (NPPF Chapter 12);

  d) The extent to which the proposed development is consistent with the development plan for the area; and

  e) any other matters the Inspector considers relevant.

Summary of recommendation: the application be approved.

1. PROCEDURAL MATTERS

1.1 The Core Documents can be found here: Beehive Centre Public Inquiry

1.2 The CD1 series of Core Documents contains the original application of August 2023 and its accompanying documents, and it includes an Environmental Statement.

1.3 The application was revised in August 2024 in response to feedback on the original application from the local planning authority, statutory consultees, stakeholders, design review and public consultation. The CD2 series of Core Documents contains the revised application and accompanying documents and includes an Environmental Statement Addendum. The description of development did not change.

1.4 The Inquiry and this report considered the revised application.

1.5 The officer's report to the Council's Planning Committee of 12 February 2025 contained a recommendation of refusal which, in summary, stated that that the scheme's maximum building parameters would have an adverse effect on neighbours' living conditions, in respect of daylight, sunlight, overshadowing and outlook.[1] Had the proposal not been called in for determination by the Secretary of State, this would have been the Council's sole reason for refusal, and it was the Council's position at the opening of the inquiry.[2]

1.6 The application was accompanied by an Illustrative Scheme.[3] This did not form part of the application itself but was intended to show how development could take place on the site. The Illustrative Scheme generally showed reduced daylight, sunlight and overshadowing impacts compared with the maximum parameters. But the Council was firm that the scheme should be determined on the maximum parameters, not the Illustrative Scheme.[4]

1.7 On Day 2 of the inquiry (25 June 2025), the Council submitted a Position Statement which established an agreed position between itself and the Applicant.[5] It stated:

> *"The parties agree that the [daylight, sunlight and overshadowing] effects of the illustrative scheme – as set out in CD7.09[6] - would be materially lesser*

[1] CD3.01 p127

[2] IQ1.01

[3] Details of the Illustrative Scheme and the maximum parameters are explained in this report from section 3 onwards.

[4] IQ1.01, paragraphs 4-7

[5] IQ1.04

[6] The appendices to the Applicant's proof of evidence on Daylight and Sunlight

than a scheme built out to the maximum parameters shown on the Parameter Plans; and that the residual [daylight sunlight and overshadowing] harm from the illustrative scheme would be acceptable in planning terms. There would be no proper basis for a [daylight sunlight and overshadowing]-related reason for refusal for a scheme which secured [daylight sunlight and overshadowing] impacts which were no worse than those shown in CD7.08[7] for the illustrative scheme."

1.8 The main parties then came to an agreement over the wording of a condition which was aimed at ensuring that the daylight, sunlight and overshadowing effects of any reserved matters proposal would be no greater than those modelled in respect of the Illustrative Scheme. This condition is included as Condition 6 in the list of suggested conditions at Annex C to this report. The Council said that the condition was necessary to enable to development to go ahead. The Applicant was content to agree the condition but maintained that it was unnecessary, for reasons explained later in this report.

1.9 The Council's planning witness then gave evidence that the condition had the effect of changing the planning balance in the scheme's favour by reducing (though not eliminating) the harm. The benefits of the scheme would now outweigh the harm. This was the Council's position at the close of the inquiry.[8]

1.10 The inquiry proceeded with the Applicant calling all its intended witnesses. They gave full evidence in chief but were not cross examined by the Council. The Council did not give further verbal evidence other than that connected with the s106 agreement and conditions. The Council's written evidence remains as in the submitted proofs of evidence except that it is modified by its Statement of 25 June 2025 and by the verbal evidence described above.

2. THE SITE AND SURROUNDINGS

2.1 There is a brief description of the site in the main Statement of Common Ground.[9]

Site location

2.2 The site is currently a retail park known as the Beehive Centre. It has a total area of 7.58 hectares and is irregular in shape, broadly forming a J-shape.

[7] The Applicant's proof of evidence on Daylight and Sunlight

[8] IQ1.20 paragraphs 5-9

[9] CD6.03 p2

2.3 It is about 1.5km to the east of Cambridge city centre, which is about a 10 minute bicycle ride or a 20 minute walk, and 1km from Cambridge railway station, which is about a 5 minute bicycle ride or a 15 minute walk.[10]

2.4 There is one point of vehicular access to the site, which is via a roundabout on Coldhams Lane. This is included within the application site boundary. In addition, there are existing pedestrian and cycle access points into the site via St Matthew's Gardens to the north, York Street to the west and Sleaford Street to the south.

2.5 Coldhams Lane forms the northeastern boundary of the site. It connects with Newmarket Road (A1134) which is a main vehicular route into the city centre. Newmarket Road also provides a link westwards via the A603 to the M11, and eastwards via the A1303 to the A14.

Current character and uses on the site

2.6 The Beehive Centre contains a number of modern large format single storey buildings typical of a retail park, amounting to some 24.000 square metres of retail space, and some 885 ground level parking spaces. Most of the buildings are utilitarian but the Porcelanosa building, with its attractive curved timber structural frame, is of a higher quality. Ground level conditions are illustrated on pp 24-25 of the 2023 Design and Access Statement; aerial views are on pages 9 and 10 of the Applicant's Masterplanning proof of evidence.[11]

2.7 There are 17 different business outlets, one of which is an Asda superstore. Other units sell flooring, kitchens, homeware, furnishings, clothing and pet products; there are cafés and there is a private gym and swimming pool.[12]

2.8 The Beehive Centre is a busy retail park which attracts a substantial amount of vehicular traffic, and there is a great deal of vehicle movement within it.

Nearby residential properties

2.9 An accurate and uncontested description of the conditions at each of the site boundaries, with photographs, is included in the Applicant's Masterplanning proof of evidence.[13]

2.10 The site is bounded by Coldham's Lane to the north east and the railway line to the south east. Residential streets adjoin the site on its northwestern, western and southern boundaries. The residential streets are as follows.

[10] CD1.02A, the 2023 DAS, contains an accessibility map at p13

[11] CD1.02A; CD7.12

[12] CD6.03 p3

[13] Ibid

2.11 Silverwood Close lies towards the northern end of the application site and is an inter-war development of mostly two storey houses arranged in short terraces. Some have rear extensions and some have rooms in the roof. The houses at 28-33, 34-39, 40-45, 46-51, 52-55, 56-59, 60-61 and 62-65A are nearest to the application site. The boundary between Silverwood Close and the application site is marked by a brick wall of around 1.5 metres.

2.12 34-39 and 40-45 Silverwood Close, with their moderate to short gardens, back directly on to the site. Some of the gardens have mature trees and shrubs, and there are some substantial deciduous and evergreen shrubs close to the boundary. However, there are some gardens and boundaries that are more open with less planting. Behind these properties, within the application site, are a footway, bicycle path, a busy access drive and an extensive area of parking. The retail units themselves are relatively distant from these houses and their gardens.

2.13 47-51, 52-55, 56-59, 60-61 and 62-65A Silverwood Close, again with moderate to short rear gardens, back on to the single storey Porcelanosa building within the retail park, or its car park. There is substantial deciduous planting along the boundary.

2.14 28-33 Silverwood Close have longer gardens and are further from the site boundary and at an oblique angle to it.

2.15 St Matthew's Gardens is a relatively modern development of homes in traditional style, situated north of the western part of the application site. The homes nearest the site are 157-221. The development contains mostly three storey town houses, with some maisonettes in two storey blocks to the northwest, although 177-201 in the centre of the terrace consists of a four storey block of flats with a lower ground floor. At the rear of 177-201 is a very small, lower level back yard.

2.16 These houses have been built very close to the boundary with the application site and they have short gardens which are at a lower level than the application site. Their boundary with the application site is defined by a strong line of deciduous hedging and trees. The gardens at the western end of the terrace back on a footway behind which is the long flank wall of a single storey retail unit. The remainder of the terrace backs on to the car park of the application site.

2.17 York Street, which is to the west of the application site, consists mostly of two storey traditional Victorian terraced houses with some more modern infilling. Many of the houses have rear extensions. Gardens are short, and at the end of the gardens is a concrete service road which serves the properties. The site boundary lies to the east of the service road and is lined with mature deciduous hedging. Beyond the boundary are the long rear elevations of a line of retail units. The ground level of the application site in this location is slightly lower than that of the houses and gardens of York Street.

2.18 Sleaford Street is to the south of the application site and consists of modern two storey houses, some designed with rooms in the roof. The flank walls of three short rows of houses face the application site which at this point contains the rear elevation of a long set of retail units. The ground level of these units is lower than the ground level of the houses and their gardens.

2.19 On the other side of the railway are The Terrace, Pym Court and Hampden Gardens, blocks of residential flats of three, four and five storeys. These are considerably further from the site than the houses described above.

The wider surroundings

2.20 South and west of the application site is a traditional densely built, low rise residential area with shops and businesses, centred on Mill Road.

2.21 To the east of the site, the buildings on the other side of the railway are generally larger in scale and footprint. Beyond these, for example along Cromwell Road and Coldham's Lane, are low rise mostly 20th Century houses.

2.22 North and north west of the site is a mixed area of large format retail premises, businesses and educational uses and housing of various periods and typologies with notable juxtapositions of buildings of different scale, character and use. There are several recent large scale commercial, hotel and education-related buildings of 4, 5 and 6 storeys.

2.23 Open spaces near the site include, to the west, St Matthew's Piece, a green which serves the local residential and business community; and to the east, Coldham's Common, a large area of grazed meadow land which is designated Green Belt.

Other retail premises in the area

2.24 Just to the north of Coldham's Lane lies the Cambridge Retail Park, which is in the same ownership as the application site.[14] It contains several large single storey retail outlets including a Lidl foodstore as well as other units selling furniture and homeware, electricals, motoring and bicycle products, sports goods, and there are cafes and a gym.

2.25 Not far to the north of the Cambridge Retail Park, across Newmarket Road, are a Tesco superstore and an Aldi store.

2.26 The Grafton shopping centre and Burleigh Street with a range of traditional high street-type shops and other businesses is a short walk or bicycle ride to the west of the site.

Heritage assets in the area

2.27 The Heritage Assessment which accompanied the planning application describes the historical development of the area, identifies relevant heritage assets and

[14] Shown outlined in blue on the site location plan, CD2.23

includes an impact assessment.[15] Heritage assets are also mapped and illustrated in the 2023 Design and Access Statement.[16]

2.28 Topic Paper 2 "Heritage Assets" contains an agreed and illustrated list of the heritage assets that the parties consider would be affected by the proposals.[17] The impact of the scheme on the identified heritage assets in both lists, as assessed by the Appellant and the Council, is set out on pages 53 and 54 of the Topic Paper. There are differences between the parties as regards the degree of impact, but in no instance is significant harm identified. This is dealt with in further detail below under "Agreed Matters".

3. RELEVANT PLANNING HISTORY

3.1 The agreed planning history is described in the main Statement of Common Ground.[18]

3.2 The site has been the subject of many planning applications since the 1970s for a variety of uses including warehousing, garden centre, storage and distribution, petrol station, retail, car showroom, supermarket, and offices. Further retail uses were added in the 1980s and 1990s. The site has been in its present format as a retail park since the early 2000s.

4. THE PROPOSAL

4.1 The description of the proposal that follows in this section is agreed between the Applicant and the Council.

General character of the scheme

4.2 The scheme would involve the total redevelopment of the site. All the existing buildings forming the Beehive Centre retail park, comprising 22,637 square metres gross internal area (24,382 square metres gross external area) would be demolished. The Retail Planning Statement contains a list of the existing retail occupiers.[19] The Design and Access Statement shows the existing building footprints plotted against the proposed scheme.[20]

[15] CD2.40A

[16] CD1.02A pp18-21

[17] CD6.17 pp7-27

[18] CD6.03

[19] CD1.19 p6 Table 2.1

[20] CD2.01B p4

4.3 The proposed development would be a street-based mixed use scheme which could deliver a theoretical maximum gross external floor area of 166,685 square metres. It would consist of ten multi-storey buildings. These are on plots labelled 1 to 10 on all relevant drawings and the numbering is used in this report. Nine would be commercial buildings for office, laboratory or local centre use, and one a multi-storey car and cycle park.

4.4 There would be ground floor accommodation for a local centre including shops, cafes, businesses and community uses. Although the scheme is in outline, the Retail Planning Statement of August 2023[21] was based on a retail centre of 5,131 square metres, consisting of 1,542 square metres of convenience floorspace, 795 square metres of comparison floorspace and 2,794 square metres of restaurants and cafes.

4.5 The scheme would create various areas of pedestrian- and cycle-friendly public realm.

Control over future reserved matters applications

4.6 The scheme would be controlled by five parameter plans which are part of the planning application.[22] The parameter plans would address land uses on ground and upper floors[23], access and circulation[24], landscape and open space[25], and maximum building heights and plots.[26] The intention of the parameter plans, given that this is an outline application, would be to provide greater certainty as to the general arrangement of the layout and the volumetric maximums for each individual building within its own defined building plot.

4.7 The scheme would also be governed by a Design Code.[27] The Design Code should be read with the parameter plans. It would be used to assess reserved matters applications for the site. It covers overall aims and values, principles for layout and character, site wide codes, codes for key character areas and building specific codes. A planning condition would require each reserved matters application to demonstrate compliance with the design code.

[21] CD1.19

[22] The parameter plans are described in CD6.03 pp6-7, the main Statement of Common Ground, and are explained in more detail in CD6.16, Topic Paper 1 on Design, Scale and Massing.

[23] CD2.20 and CD2.19

[24] CD2.17

[25] CD2.16

[26] CD2.18

[27] CD2.64, A to E.

4.8 There is also an Illustrative Scheme.[28] The components of the Illustrative Scheme are listed in the main Statement of Common Ground.[29] It is described in more detail in the Applicant's Masterplanning proof of evidence, which contains the relevant illustrative plans.[30]

4.9 The Illustrative Scheme includes the eb7 Daylight and Sunlight reports which are image extracts of the 3D model, and a calculated assessment of the impacts of the Illustrative Scheme.[31] These are relevant to the assessment of impacts later in this report and is referred to in Condition 6.

4.10 The Illustrative Scheme was developed as part of the application and was revised to support the formal application amendment in August 2024. It is not part of the application but has been submitted to demonstrate how a scheme might be developed to accord with the parameter plans and the design code. It represents one way in which the development could come forward at reserved matters stage within those controls.

Layout and land uses

4.11 The parameter plans set out the basis of the layout and land use pattern.[32] The scheme has been designed in such a way that it would deliver a range of floorplate sizes, between 1,193m² and 5,247m² gross external area. Each building could be subdivided at each floor into a number of tenancies, offering flexibility to accommodate tenants of all sizes, from start-up and scale-up to large global firms.

4.12 The Illustrative Scheme takes forward land uses and building floorspaces in more detail.[33] Wet laboratory space[34] would be accommodated on Plots 2, 3, 5 and 6, office space on Plots 1, 4, 7, 8 and 10 and local centre uses on Plots 4 to 10. Plot 10 would be a multi storey car park. Covered cycle parking would be located next to Plot 1.

[28] Sometimes referred to as the Illustrative Masterplan

[29] CD6.03, pp7-8

[30] CD7.12 Section 9

[31] CD7.09

[32] The parameter plan governing ground floor land use is shown on CD2.20 (Drawing PO - LDA - ZZ - XX - DR - A – 08004 REV P2) and that for the upper floors is on CD2.21 (Drawing PO - LDA - ZZ - XX - DR - A – 08005 REV P2).

[33] CD7.12 pp 52-53.

[34] A wet laboratory facilitates physical, chemical or biological analyses and experiments, in contrast to a dry laboratory, where research is primarily computational and theoretical and is less easy to distinguish from offices.

4.13 Buildings, streets, spaces and entrances would aim to create an active mixed-use local centre within the streets south of Plot 3. This would comprise some 5,178 square metres of space which would be available for a supermarket, community uses, a gym, and restaurant and café uses. A dedicated community space and a science, technology, engineering and mathematics education centre would be included within Plot 10. Externally there would be greenspace, community space and playspace, and a skating area would be located between Blocks 5 and 6. These parts of the Illustrative Masterplan have been informed by community consultation.[35]

Access and circulation

4.14 The Beehive Centre currently takes vehicular access from the southern arm of a four-arm roundabout with Coldhams Lane.

4.15 The proposed scheme would still take vehicular access from Coldhams Lane but the existing roundabout would be replaced by a new junction. This would be in the form of a Cycle Optimised Protected Signals (CYCLOPS) junction which would prioritise pedestrian and bicycle movements over car movements. The junction would fit within the existing roundabout footprint. It would provide sufficient capacity to accommodate trip generation from the scheme.[36]

4.16 A primary vehicle route carrying two way traffic would lead into the site from the Coldhams Lane junction. It would align broadly with the northern boundary of the site and would provide access to Plot 10, the multi-storey car park. It would loop round Plot 8 at its western end. This route would accommodate buses, service vehicles and private motor vehicles. A spur from this route would take service vehicles to the service yard adjacent to the railway. There would be a further service yard to the west near York Street. Vehicle movement would be monitored and controlled by an ANPR scheme and appropriate signage.[37]

4.17 A number of pedestrian and bicycle routes would be created. There would be a main spine from northeast to southwest, linking Coldhams Lane with Sleaford Street, serving Plots 2-7 and 9-10 with a spur to Plot 1 and pedestrian loops around Plots 8, 9 and 10. The spine would pass through several different spaces as discussed below.[38]

4.18 A total of 395 car parking spaces would be provided, of which 374 would be within Plot 10, the multi-storey car park. This would include accessible spaces (10%) and spaces for rapid EV charging (5%). There would be a passive allowance for 100% of spaces to accommodate EV charging. In addition to the

[35] CD7.12 pp 35-36 and pp 55-56.

[36] CD2.47A Transport Assessment Part 1, pp27-28

[37] CD2.47A, pp29-35

[38] CD2.47A, p29

accessible spaces within the multi-storey car park, there would be 21 disabled spaces at-grade close to the buildings.[39]

4.19 The proposed scheme would have 490 fewer parking spaces than the existing Beehive Centre.

4.20 A total of 4,593 bicycle parking spaces would be provided within the site. This would exceed the Cambridge City Council cycle parking standards which would require 3,126 or 3,968 spaces, depending on how measured.[40]

4.21 The scheme would include a number of off-site walking and cycling and public transport improvements. These are set out in Schedule 10 of the s106 Agreement[41]

Placemaking, landscape and open space

4.22 The proposal contains considerable detail about placemaking and the public realm. Much of this is contained in the Design Code. There is also a Benefits Delivery Plan.[42]

4.23 Part 1 of the Design Code[43] contains the overall vision and place principles for the scheme.

4.24 Part 2 of the Design Code[44] contains the Masterplan Framework. This includes codes for the spatial hierarchy and active frontage; legibility; inclusive design; active travel; ground floor organisation to create active spaces; servicing, access and car parking strategy; character areas; street typologies; landscape vision; the tree strategy; ecology and biodiversity enhancement; the water framework; a play and leisure strategy; and lighting, wayfinding and security. Its section on street typologies contains a series of cross sections, not only across the proposed streets, but also between the proposed development and adjacent homes. It demonstrates the urban, street based nature of the scheme and the sense of enclosure within the streets.

4.25 Part 3 of the Design Code[45] includes the design principles for built form including the provision of active street frontages, together with a section on street typologies. It stipulates that the upper Above Ordnance Datum level for each

[39] CD2.47A, p31

[40] CD2.47A, p32

[41] CD7.25

[42] CD2.11A

[43] CD2.64A

[44] CD2.64B

[45] CD2.64C

building is that measured at parapet level and must include all building elements including roof top plant, lift overrun and PV. It requires buildings to create a coherent place, respond to adjacent buildings in scale and character, complement each other, break down large masses and introduce variations in heights. It states that buildings should use setbacks, stepped plans and angled facades to reduce the visual impact of mass and break down bulk.

4.26 Part 4 of the Design Code[46] establishes character areas for different parts of the development and sets out the design codes for them. These are:

- Abbey Grove, the entry and gateway space into the scheme, with significant tree planting
- Garden Walk, a pedestrian-priority linear space with pedestrian and segregated cycling routes
- Maple Square, a civic space at the centre of the development, containing existing and new trees and gardens, forming the centre of the development and being designed to host events
- Hive Park, a green space with large tree planting at the southern entry point of the site that would have an active role with parkside cafes and restaurant
- The Lanes, a new street network with active retail and mixed uses, which would provide access to buildings and would connect York Street and St Matthew's Gardens into the development
- Railway Corridor, a private servicing area along the boundary with the railway.

4.27 The Parameter Plan "Landscape and Open Space"[47] shows the parameters for different types of space, including publicly accessible green areas, publicly accessible hard landscape areas service or access areas, green planted edges and hard landscape streetscape areas.

4.28 Part 5 of the Design Code[48] provides detailed codes for each of the proposed building plots.

Building heights and massing

4.29 Agreed Topic Paper 1 "Design Scale and Massing" provides a brief explanation of this subject.[49]

[46] CD2.64D

[47] CD2.16

[48] CD2.64E

[49] CD6.16. Note: some of the plans in the Topic Paper have not reproduced clearly in electronic form. However, the submitted plans themselves, as referred to in this report, are clear.

4.30 The scheme aims to vary building height and footprint, and to concentrate taller buildings towards the centre of the site and the railway, with reduced building heights or footprints towards residential boundaries.

4.31 Parameter plan "Maximum Building Heights and Plots" [50] defines the maximum parameters for building floor coverage and heights (shown as Above Ordnance Datum). The plan allows for a degree of flexibility in the siting of buildings at reserved matters stage, within the defined maximum parameters. Each plot is defined by a zone. A maximum development footprint is set for each area as a percentage of the total plot area.

4.32 The Illustrative Scheme takes these parameters into account. It shows building dimensions which are moderately reduced from the maximum building envelopes shown on the parameter plan, representing the control exerted by both the requirements of the parameter plans and the design code over the maximum plot coverage and minimum separation between buildings. The footprints of the buildings in the Illustrative Scheme are shown as dotted lines on the parameter plan CD2.18. A comparison of the maximum parameter envelope with the Illustrative Scheme is included in Topic Paper 1.[51] A graphic illustration which compares the massing of the existing development, the massing of the proposed development in the parameter plans and that of the Illustrative Scheme, and the massing of surrounding development, and includes rounded Above Ordnance Datum building heights, is set out in the Appendices to the Appellant's Daylight, Sunlight and Overshadowing proof of evidence.[52]

4.33 Flues are subject to their own maximum heights. The parameter plan CD2.18 defines areas, shown hatched, where fume extraction flues would be located. They would be a maximum addition of 25% of the maximum height of the host building measured from ground level. Part 3 of the Design Code[53] contains more detailed requirements for the design, location and grouping of flues.

4.34 It can be seen from the parameter plan CD2.18, and from the Illustrative Masterplan material described above, that the upper floors of several of the buildings would be set back where they are near to residential properties. The Design and Access Statement contains an axonometric massing diagram which demonstrates this design approach.[54] It can also be seen in plan form on CD7.12 p59 and p60, in Topic Paper 1[55] and in CD7.09 pp2-7.

[50] CD2.18

[51] Ibid

[52] CD7.09 pp2-7

[53] CD2.64C pp80-81

[54] CD2.01B p36

[55] CD6.16 p15

4.35 The Applicant's Masterplanning proof of evidence[56] sets out the building heights within the Illustrative Scheme and the number of storeys of each building. Maximum building heights and storeys are also listed adjacent to the axonometric diagram on p36 of the Design and Access Statement and, as discussed above, in the Appendices to the Appellant's Daylight, Sunlight and Overshadowing proof of evidence.

4.36 Appendix A to the Applicant's Masterplanning proof of evidence[57] contains further detail about the relationship of the scheme to nearby residential properties, including dimensioned cross sections and indicative views for the parameter plans and the Illustrative Scheme. It also tabulates this information and includes comparator relationships.

4.37 The following table (which I have compiled) brings the information together.

Plot	Max no of storeys	Max height, metres (rounded figures)	Number of storeys nearest to residential properties	Height near residential properties, metres	Distance to nearest residential property
1 (Facing Silverwood Close)	3	15.9	1	10.8 (parameter plans), 5.6m (Illustrative Scheme)	18.5m (nearest) 21.5m (main rear wall)
2 (No direct facing condition with Silverwood Close)	5	25.4 (31.8 with flue)	5	25.4 (31.75 incl flue zone)	39m – 42m
3 (Facing Silverwood Close)	4	20.8 (26.0 with flue)	4	20.75m (26m incl flue zone)	39m - 41m (parameter plans), 44m (Illustrative Scheme)
4	6	30.1	n/a	n/a	n/a

[56] CD7.12 p60 and p52

[57] CD7.13

(No direct facing condition)					
5 (No direct facing condition)	7	35.7 (44.6 with flue)	n/a	n/a	n/a
6 (Adjacent to Sleaford Street)	6	31.1 (38.9 with flue)	2/3	11.18 (but ground level 2.2m lower)	3m (parameter plans) 6m (Illustrative Scheme)
7 (Facing York Street)	6	28.7	3	15.09 (but ground level 2.2m lower)	32m (parameter plans) 33m (Illustrative Scheme) (35m – 36m to main back wall)
8 (Facing York Street)	6	28.7	3	15.09 (but ground level 2.39m below York Street)	33m (parameter plans) 34m (Illustrative Scheme) (37-38m to main back wall)
8 (Facing St Matthew's Gardens)	6	28.7	3	15.09	20m-23m (parameter plans) 23m-26m (illustrative Scheme)
9 (Facing St Matthew's Gardens)	7	32.9	3	15.09	33.5m
10 (Facing Silverwood Close)	8	25.1	8 (but lower storey heights)	25.09	27m-32m

5. THE ENVIRONMENTAL STATEMENT

5.1 The development is of a type and scale that falls within Schedule 2(10) (b) of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 as an 'Urban Development Project'. Significant environmental

effects are considered likely in the absence of measures to reduce those effects. An Environmental Statement was submitted in support of the original outline planning application in 2023[58] and an Environmental Statement Addendum was submitted in support of the revised application in 2024.[59]

5.2 The Environmental Statement Addendum is intended to be read in conjunction with the originally submitted Environmental Statement. It covers methodology; site context; a description of the proposed development including an assessment of alternatives; planning policy; air quality; cultural heritage; flood risk, drainage and water resources; ground conditions and contamination; townscape and visual matters; noise and vibration; socio-economic matters; transport; cumulative effects; conclusions and a summary of mitigation measures and residual effects. Any information that was not altered from the original Environmental Statement is not included in the Addendum and remains valid and unchanged.

5.3 The Environmental Statement and Environmental Statement Addendum are a comprehensive assessment of environmental effects and meet the Environmental Impact Assessment Regulations.

6. POLICY AND GUIDANCE

6.1 The adopted development plan comprises the Cambridge Local Plan (adopted October 2018)[60] and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted July 2021).

6.2 The site is within the Cambridge urban area but does not have a specific policy designation.[61]

6.3 The development plan policies that specifically relate to the matters identified by the Secretary of State are listed in the agreed Statement of Common Ground and in Topic Paper 5, “Development Plan Policies”.[62] To avoid repetition they are not elaborated on here, but this report assesses the scheme against the relevant policies under Matter d).

6.4 Cambridge City Council and South Cambridgeshire District Council are jointly preparing the Greater Cambridge Local Plan which will cover both administrative

[58] CD1.05A to 05H

[59] CD2.36A to 36G

[60] The Cambridge Local Plan is CD4.04 and the Policies Map is CD4.05

[61] CD2.03A p12, CD4.05

[62] CD6.03 pp11-12, CD6.20

areas.[63] The site is included as an Opportunity Area in the draft plan.[64] The plan has reached Regulation 18 stage and is therefore at an early stage of preparation. Section 6 of the main Statement of Common Ground includes an overview of the draft plan. The parties agree that it therefore carries very limited weight in decision-making.[65]

6.5 The publication "Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice" (2022) published by the Building Research Establishment (BRE) (the "BRE Guidance") is a material consideration.[66]

6.6 The Council has adopted several supplementary planning documents which are relevant to the application. These are listed at paragraph 3.17 of the Council's Planning proof of evidence.[67] and cover Planning Obligations, Public Art, Open Space and Recreation, Flood and Water, Sustainability Design and Construction, Biodiversity, and Health Impact Assessments. They are included in the list of Core Documents.[68]

6.7 Other relevant documents and studies are listed in 3.19 of the Council's Planning proof of evidence. These are referred to in various proofs of evidence and are included in the CD9 section of the Core Documents list.

7. AGREED MATTERS

7.1 As almost all the factual evidence is now agreed between the Applicant and the Council, this section incorporates key agreed evidence from the main parties' proofs and appendices as well as from the Statements of Common Ground and Topic Papers and relevant technical reports. The remaining differences of interpretation and impact are covered in the cases for the parties – these include the parties' analysis and commentary on daylight, sunlight and overshadowing. There are still objections to the scheme from local residents and councillors, and these are set out in Section 10 of this report.

7.2 This section is structured on the lines of the matters which the Secretary of State particularly wishes to be informed about.

[63] CD5.01 and CD5.02

[64] CD2.03A p13, CD6.03 p13

[65] CD6.03

[66] CD8.01

[67] CD7.02 p12

[68] CD4.01 to CD4.03 and CD4.06 to CD4.09

Sources

7.3 The sources for the agreed matters are as follows.

- Statement of Common Ground: this contains points of agreement between the parties in respect of the site description; planning history; the proposed development and all its components; inquiry documents; the development plan and relevant policies and the emerging local plan.[69]
- Supplementary Statement of Common Ground: this covers the subjects of Daylight, Sunlight and Overshadowing.[70]
- Agreed Topic Paper 1: Design, Scale and Massing. This includes agreed facts on maximum building heights and plots, land uses, access and circulation, landscape and open space. [71]
- Agreed Topic Paper 2: Heritage Assets. This sets out agreed methodology and identifies where there is agreement and disagreement over the impact on heritage assets.[72]
- Agreed Topic Paper 3: Business Needs. This establishes agreed matters in respect of business needs, floorspace supply and economic benefits. [73]
- Agreed Topic Paper 4: Daylight, Sunlight, Overshadowing and Outlook. This contains an agreed technical and policy background which among other things explains the methodologies and guideline target criteria in document BRE209: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (June 2022) (the BRE Guide).[74] It also identifies the key properties for daylight and sunlight assessment. [75]
- Agreed Topic Paper 5: Development Plan Policies. This has already been referred to above in the section on the Development Plan.[76]
- Agreed evidence in proofs and appendices: key pieces of agreed evidence are referred to as appropriate and are referenced in the footnotes.

[69] CD6.03

[70] CD6.06

[71] CD6.16

[72] CD6.17

[73] CD6.18

[74] CD8.01

[75] CD6.19

[76] CD6.20

Agreed evidence in respect of Matter a): The extent to which the proposed development is consistent with Government policies for building a strong competitive economy

7.4 The proposed development would create a new research and innovation employment quarter on a site that comprises previously-developed land in a well-located, accessible edge of centre location within the city.

7.5 The Greater Cambridge area is a strategic location for life science and technology research sectors, in both national and international terms.[77]

7.6 The Greater Cambridge Growth Sectors Study ("the Iceni study") of September 2024[78] looked in depth at the location, land and accommodation needs of the life science and information and communications technology sectors. In section 8 the study analyses demand and supply. The tables in that section show a surplus of commitment over demand for dry labs and offices and a deficit for wet lab space. However, the report states that some of the theoretical committed supply in planning terms is not readily deliverable. There may remain a shortfall in scale-up space and a shortfall in wet lab commitments towards the end of the local plan period.[79]

7.7 Moreover, for the life science sector, the study reported that there is a trend towards demand for integrated place-based locations that encompass quality premises with amenities and public transport connectivity and a critical mass to create a community. As regards information and communication technology space, there is a focus on premium locations with good public transport, incubator and start up space and clustering. High quality start-up space and scale-up space will remain in demand.

7.8 Against this background it is agreed by the main parties that the need for additional office and lab floorspace in the city area has been demonstrated and that it is crucial that adequate supply continues to meet the evolving requirements of the life sciences and information and communication technology sectors. The scheme would make a significant contribution to the Cambridge knowledge-based research and development cluster, reflective of the demand trends described above, whilst also allowing sustainable change and efficient renewal of previously developed land to be embraced. Its large flexible-plate laboratory space would contribute towards meeting the current identified need for employment floorspace, including wet and dry laboratories and offices.

[77] CD7.16 p21

[78] CD9.18

[79] There is a difference of opinion between the Council and the Applicant about the quantitative need for offices and labs and this is addressed below under the case for the Applicant.

7.9 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.[80]

7.10 The scheme would create an estimated 6,445 direct jobs comprising 905 entry level, 1,225 mid-skilled and 4,315 high skilled workers. Overall, the development would deliver around 7,130 net additional jobs (6,480 full time equivalent).[81]

7.11 There are about 855 (670 full time equivalent) existing jobs at the Beehive Centre.[82]

7.12 The scheme would deliver an estimated £660m in Gross Value Added annually in economic output. The site currently generates £60m resulting in a net increase of £600m.[83]

7.13 Annual tax revenues would be an estimated £180-240m. Additional business Rates would amount to an estimated £8.5m. There would be an additional estimated £9.6m worker expenditure in the local economy.

7.14 The scheme would deliver an Employment and Skills Strategy including outreach programmes for apprenticeships focused on identified and deprived areas in Cambridge, the targeting and training of local people, targets for diversity and inclusion, and working partnerships with other organisations. It would include dedicated education space and a commitment to work with other bodies and local schools to improve pathways to the life sciences sector.

7.15 The development would be compliant with Local Plan Policy 2 (Spatial strategy of the location of employment development) and Policy 40 (Development and expansion of business space). It would also accord with the objectives of NPPF Chapter 6 (Building a strong, competitive economy), particularly: 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)".

[80] CD9.28

[81] The overall figure is for net additional employment, taking into account both displacement and the multiplier effect. The FTE equivalent is 6,480. For a detailed breakdown, see CD7.16 pp 11-15, particularly Tables 3.1 and 3.4.

[82] For a detailed breakdown, see CD7.16 p12.

[83] CD7.16 pp 16-17

Agreed evidence in respect of Matter b): The extent to which the proposed development is consistent with Government policies for ensuring the vitality of town centres

7.16 The scheme would contain a local centre. The proposed town centre uses would form part of a wider masterplan vision for the application site.

7.17 A Town Centre Use Retail Planning Statement dated August 2023[84] was submitted with the original application. This stated that the intention was to create a high-quality local centre for future employees on the application site as well as for existing local residents in the local catchment area, and in part it would replace some of the lost retail floorspace that is currently provided on the site. For these reasons it would not be suitable or viable to locate it any other centre outside of the application site.

7.18 The Statement continued that, given the site-specific nature of the proposed retail/town centre use floorspace, a sequential assessment of sites outside of the application site should not be required; and given the reduction in retail floorspace, a retail impact assessment was also not technically required. Nevertheless, the statement included both a sequential assessment and a retail impact assessment. These assessments concluded that the employees on the application site and the residents within the catchment area would be able to support the retail and town centre use floorspace and that the scale of retail floorspace was appropriate. There was no evidence that local centres were vulnerable to impact.

7.19 A critique of this statement, commissioned by the Council and dated 8 December 2023,[85] concluded that there was no site-specific need or policy support for a new centre in this location and that the sequential test or retail impact test had not been passed. However, the Statement of Common Ground[86] records the agreement of the Applicant and the Council to the passage in the committee report[87] which states that the supporting retail statements have 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.

7.20 The site is not the subject of protective retail or town centre policies in the adopted plan, and therefore the loss of the retail provision from the site gives rise to no concerns in policy terms. The Cambridge Local Plan does not include the Beehive Centre within the existing hierarchy of shopping centres, and it does not provide policy protection for the retail quantum or type/mix of spaces. There is no

[84] CD1.19

[85] CD2.29

[86] CD6.03 paragraph 7.16

[87] CD3.01 paragraphs 13.20 to 13.42

restriction on the current use of the site under Class E. The scheme would result in a move from large-format retail units to smaller units within a local centre.[88]

7.21 As regards the potential loss of local facilities, there is a range of alternative retail outlets in the area.[89] The work of relocating occupiers from the Beehive Centre and creating possible floorspace at the Cambridge Retail Park is ongoing[90]. The Cambridge Retail Park is not at capacity as retailers are looking for less space when their rental terms come to an end. The likely way forward is a combination of sub-division, refurbishment and some potential new space to accommodate some facilities displaced from the Beehive Centre. Some elements of this would require planning permission in due course.

7.22 Insofar as food retailing is concerned, the scheme would bring with it options for food retailing, including small convenience shopping. There is no reason to conclude at this stage that major convenience shopping would not be retained since it might be relocated to the Cambridge Retail Park. But even if that were not to happen, there is a substantial range of food retailing (including discounters Aldi and Lidl as well as Tesco's superstore) within easy travel distance from the residential areas around the site.[91] There is therefore no evidential basis for concluding that the scheme will leave local people without food shopping resources close at hand.

7.23 The scheme would not replace the swimming pool associated with the gym. There would thus be a partial conflict with Local Plan Policy 73 resulting from the loss of an existing leisure facility on the site and the absence of a like-for-like replacement. However, it is not a public pool, being accessible only to those with membership of the gym. There are public pools in this part of Cambridge including that at Parkers Piece. The Council does not object to the loss of the pool and there is a financial contribution in the s.106 obligation, reflective of additional potential upkeep of alternative pools in the area.

7.24 To conclude, 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. The scheme would be in accordance with the requirements of Policy 6 of the Cambridge Local Plan and would be consistent with national planning policies set out in NPPF Chapter 7.[92]

[88] CD6.03 paragraph 7.15-16

[89] CD7.17 pp 4-6

[90] Table 3.2, page 12 and 3.17 referring to relocations.

[91] CD7.17 pp4-6

[92] CD6.03 paragraph 9.2 b)

Agreed evidence in respect of Matter c): The extent to which the proposed development is consistent with Government policies for achieving well-designed places

7.25 There is residual disagreement between the parties on the issues of impact on neighbouring properties and on heritage and townscape impacts. Other than these, the parties agree that the proposed development would be compliant with Local Plan Policy 56 (Creating successful places), Policy 57 (Designing New Buildings), and Policy 59 (Designing landscape and the public realm), and would accord with the objectives of NPPF Chapter 12 (Achieving well-designed places) in respect of making efficient use of land and being sympathetic to local character and history.

Daylight, sunlight and overshadowing

7.26 Appropriate research has been undertaken into the use and layout of neighbouring properties to inform the technical analysis and ensure an acceptable level of accuracy in the modelling.

7.27 The appropriate technical assessment methodologies and guideline target criteria are those set out in document BRE209: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (June 2022) (the BRE Guide).[93]

7.28 In respect of daylight within buildings, the primary concern relates to main habitable rooms of bedrooms, living rooms, kitchens and dining rooms. Non-habitable and secondary spaces are considered less relevant. In respect of sunlight within buildings the effects to main living rooms and conservatories are most relevant.

7.29 The technical assessment of daylight / sunlight reductions is the first stage in a two-stage approach to the acceptability of the effects as confirmed in Rainbird, R (on the application of) v The Council of the London Borough of Tower Hamlets [2018] EWHC 657 (Admin).[94] Where the daylight, sunlight and shading effects of the proposal meet the numerical criteria set out in the BRE guidelines they are considered to be acceptable. Where they are not met, the second stage is to consider whether the identified impacts would be "unacceptable". This second stage of the test requires the consideration wider factors. This may be informed by the guidance within Appendix F and Appendix H of the BRE document in respect of alternative targets and assigning significance to the effects. Other relevant factors may relate to the site context, relevant comparative typologies, special circumstances, consideration of alternative targets, and any other applicable source documents.

7.30 The numerical targets within the BRE document are not mandatory and should be interpreted flexibly. Given the nature of the pre-existing site, it is to be anticipated

[93] CD6.06

[94] CD10.03

that meaningful redevelopment may lead to the potential for some reductions in daylight and sunlight which may not meet the BRE target criteria. The questions to be addressed under this two-stage approach are a) whether or not the proposals would result in a "material deterioration" of daylight and sunlight conditions b) whether or not any such deterioration would be "unacceptable".

Efficient use of land

7.31 The current site represents an inefficient use of previously developed land in a highly sustainable location. The site would represent a major 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. It would comply with Local Plan Policy 2 (Spatial strategy of the location of employment development) and Policy 40 (Development and expansion of business space). The absence of a residential component within the Proposed Development does not conflict with the spatial strategy or policies contained within the Local Plan.

Design quality

7.32 The scheme would transform an outdated retail park dominated by parking into an accessible, inclusive and landscaped public realm. Its quality would be assured by the Design Code and parameter plans.

7.33 There would be a Greenway (strategic cycle route) connecting through its spine and significant civic spaces provided including Hive Park (7,000 square metres), a size equivalent to nearby St Matthews Piece, a space for leisure and amenity which would be delivered in the first phase of the development. 2.6 ha of open space would be provided across the wider site, including other landscaped areas. The open spaces would bring positive health benefits.

7.34 The 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, of about 5,100 square metres, would animate the frontages and spaces.

Heritage

7.35 Topic Paper 2: Heritage Assets sets out agreed and non-agreed heritage matters.[95] It is agreed that the scheme would affect the significance of 6 heritage assets. These are:

- Mill Road Conservation Area, which adjoins the south western side of the site;
- Christ Church in Newmarket Road, Grade II listed
- Jesus College Chapel, Grade I listed
- All Saints Church, in Jesus Lane, Grade I listed

[95] CD6.17

- Castle and Victoria Road Conservation Area, to the north of central Cambridge
- Central Cambridge Conservation Area

7.36 The significance of these heritage assets is fully described and illustrated in the Topic Paper.

7.37 The Topic Paper also contains a further list of heritage assets which the Council considers to be affected by the scheme but which the Applicant considers are not affected.[96] These include

- Mill Road Cemetery (Registered Park and Garden)
- Kings College Chapel
- St Mary the Great Church
- St John's College
- University Library
- Kite Conservation Area
- Riverside and Stourbridge Common Conservation Area

7.38 The Council and the Applicant agree that the public benefits of the application scheme would collectively be sufficient to outweigh the identified harm to the significance of all the heritage assets.

Other agreed matters

Sustainability

7.39 The development is supported by strategies relating to energy, water, urban heat island effect and wider human health and wellbeing.[97] There is also a Benefits Delivery Plan.[98] The development would achieve an Outstanding BREEAM (Building Research Establishment Environmental Assessment Method) rating for all office buildings. All other buildings would achieve a minimum rating of Excellent. The scheme would have embodied carbon targets of less than 600kg CO2/square metre for office and 750kg CO2/square metre for laboratories. There would be a strategy for sustainable construction sourcing. Electric vehicle charging points would be provided. Water consumption would be limited through BREEAM Wat 01 credits and a push target for Exemplary Performance.

[96] CD6.17 pp28-52

[97] CD2.33, CD2.34

[98] CD2.11A

7.40 The proposal would thus deliver a highly sustainable development in accordance with Local Plan Policy 28 and 29, and the Council's Sustainable Design and Construction Supplementary Planning Document.

Ecology and biodiversity

7.41 The proposals target over 100% biodiversity net gain. The Council's aspirational target is 20%.

Trees

7.42 60 individual trees and part of a tree group would be removed including two trees subject to a Tree Preservation Order. 58 trees, groups of trees and hedgerows would be retained and protected.

7.43 At least 290 new trees would be planted, resulting in a net increase of 230 trees. The development complies with Local Plan Policy 59 (Designing landscape and the public realm) and Policy 71 (Trees).

Flood risk

7.44 The Lead Local Flood Authority has raised no objection on flood risk and surface water drainage matters, subject to conditions. Anglian Water has raised no objection on foul water and trade effluent matters.

7.45 The mitigation and management measures in the Flood Risk Assessment would adequately address any potential flood risk and drainage impacts. The scheme would comply with Local Plan Policies 31 and 32 relating to water management and flood risk.

Water resources

7.46 The effects of the scheme on the local water supply network and associated ecological and environmental receptors are predicted to be negligible following implementation of mitigation. The mitigation is set out in the Sustainability Strategy.[99] The scheme complies with a range of Local Plan policies in this regard including Policies 28, 31 and 70 and the Council's Sustainable Design and Construction Supplementary Planning Document.

Environmental issues

7.47 There are no unacceptable impacts in respect of soil, air, water, wind and noise pollution that could not be controlled through planning conditions. The scheme complies with Local Plan Policy 33 (Contaminated land), Policy 34 (Light pollution control), Policy 35 (Protection of human health and quality of life from noise and vibration), Policy 36 (Air quality, odour and dust), Policy 37 (Cambridge Airport Public Safety Zone and Air Safeguarding Zones) and Policy 38 (Hazardous installations).

[99] CD2.34; see also Chapter 8 of the Environmental Statement, CD1.05c

Transport, highways and parking[100]

7.48 On site parking would drop from 885 to 395. Bus services to the site are planned to be increased to 15 per hour at peak times. There would be estimated reductions in two-way car trips from the site of 10,000 per weekday and 12,000 per weekend day. Through the s106 Agreement the scheme would make financial contributions towards bus service improvements, the costs of implementing additional resident parking schemes and strategic transport schemes including Eastern Access and a Monitor and Manage Fund.[101]

7.49 The scheme complies with Local Plan Policy 80 (Supporting sustainable access to development), 81 (Mitigating the transport impact of development) and 82 (Parking management). The local highway authority and Active Travel England have raised no objections to the proposals.

Public art

7.50 The application is supported by a Public Art Strategy[102] which includes the delivery of permanent and temporary art-based projects, including community engagement. In this regard it would comply with Local Plan Policy 56 (Creating successful places) and Policy 59 (Designing landscape and the public realm).

8. THE CASE FOR RAILWAY PENSION NOMINEES LTD (RAILPEN)

General points

8.1 The main parties now agree that permission should be granted for the application scheme, subject to conditions and s.106 obligations.

8.2 That position arises as set out in the Council's Position Statement of 25 June 2025[103] and is covered in its closing submissions, but clearly it is a matter of some importance that the Council has effectively withdrawn its one putative reason for refusal (relating to residential amenity) on the basis that the matter can be covered by condition and on the basis that other harms are outweighed by scheme benefits.

[100] See CD2.47A, the Transport Assessment. Section 7 deals with trip generation.

[101] CD7.25

[102] CD2.65

[103] IQ 1.04

8.3 The Applicant's evidence was called without cross-examination by the Council on the basis that the Council considers that any remaining difference of opinion is immaterial to the overall outcome.

8.4 The Applicant has undertaken very careful work over some years with the officers of the Council and other stakeholders. The scheme is a high-quality proposition brought forward by a team exceptionally well versed in Cambridge and in the development sectors it is intended to serve.

8.5 The provision of considerable life sciences floorspace and offices in a City location – not on the fringes of the urban area – would meet key national targets for economic growth in one of the most important places in the country.

8.6 From its current retail park use, the application scheme aims to transform the site into a rich mix of research and development labs, offices and local facilities.

8.7 The drawings are listed in the draft conditions and comprise the red line location drawing, five Parameter Plans and Design Code.

8.8 There is also a set of drawings and images which show the Illustrative Scheme. This played an important role in the Council's revised position on the modelled daylight, sunlight and overshadowing results relating to the Illustrative Scheme; but it also plays an important role in showing the likely quality of design and sense of place that the scheme will have, and also the way that it will fit into the surrounding area and Cambridge as a whole.

8.9 Unlike in many outline proposals, the cross-cutting stipulations in the parameter plans and the Design Code mean that the Illustrative Scheme is, effectively, a detailed representation of the parameter plans or outline version of the scheme. It would not be possible to bring forward a scheme at reserved matters stage which filled in the maximum parameter plan boxes. That is principally because of the stipulation in the parameter plans that only a certain percentage of each of the ten plots may be developed (averaging around 80%, though it varies plot to plot), but it also stems from the overlaid requirements for minimum distances between buildings and areas reserved for open space and circulation.

8.10 The upshot is that the Illustrative Scheme can be relied on in massing, height and daylight, sunlight and overlooking terms as tantamount to the scheme for which permission is sought in outline.

8.11 The controls over the outline permission would be:

- A condition controlling the form of the development by requiring reserved matters to conform to the five approved parameter plans
- A condition controlling the form of the development by requiring the reserved matters to abide by the terms of the Design Code.
- The Design Code containing mandatory requirements: see lists in the Applicant's Masterplanning Appendices, particularly Appendix B which collates all the references in the Design Code to way that residential amenity is protected by the Code's stipulations.

8.12 There is no specific control over the balance between the amount of lab space and office space, but the parameter plans identify which have been designed (in outline) to cater for labs. There is some overlap between the idea of lab and office because some life science and research and development is primarily information technology or artificial intelligence based and wet lab space is not required. However there is a clear market demand (and premium in rent) for wet labs, and therefore office space in the traditional sense is unlikely to represent the majority of the floorspace in due course. If anything, it is likely to be predominantly labs both wet and dry and related office space.

8.13 The Applicant's planning evidence[104] sets out the way that the application scheme came about. That narrative is relevant to how and why the scheme aligns with policy objectives at the local and national level.

8.14 Railpen purchased the site in September 2012 with the intention of operating the retail park as part of its wider property portfolio. However, changes in the retail market have led to a portfolio review of the site, and the identification of the opportunity to redevelop it. The site is all under Railpen's single freehold ownership. It is large and well located in a city that has a strong enough context in which to have commercial confidence to redevelop at scale.

8.15 The uses in the scheme have emerged from the commercial and policy context. A large and resilient component of the Cambridge economy is its life science and knowledge industry sector. The site provides the ability to shape a scheme with sufficient critical mass to create excellent facilities and amenities within a city location and thereby create a rare, city centre commodity within the Cambridge commercial environment.

8.16 Railpen has the commercial understanding and confidence borne of its track-record in development delivery and management, including within Cambridge. It owns further land and property interests in the City including: Devonshire Gardens 'Mill Yard' (a development under construction a short walk from Cambridge Railway Station), for homes and workspace; and Botanic House (under construction for a major new office research and development building adding to the Railway Station high-tech cluster).

8.17 The delivery strategy is to deliver the scheme in phases. Railpen acquired nearby Cambridge Retail Park in November 2020. Whilst the changing retail market cannot not support two adjacent retail parks, it could support one. So, while there is no planning policy requirement to replace the floorspace to be demolished or to relocate the retailers from the Beehive Centre, it makes commercial sense to relocate retailers, where possible and practical, on to Cambridge Retail Park. That would bolster the Retail Park's retail resilience and support investment in it as a shopping destination. Discussions to relocate important existing food and non-food retailers from the site to Cambridge Retail Park are well advanced.

[104] Proof pages 5-6 and in the Presentation (Day 1) CD7.10.

8.18 There has been a very extensive programme of work, including all the usual technical assessments as well as engagement with local stakeholders. The process was highly collaborative until the very end when the issue of residential amenity, including the way that planning conditions and the Illustrative Scheme were viewed, led the officers to recommend refusal. However, the key points set out in the Planning Performance Agreement[105] capture the essence of why the scheme brings such overall benefits, notably the joint agreed 'Vision and Objectives' between the Applicant and the Council. These points are as follows.

8.19 The site represents a sizeable piece of land adjacent to the city centre currently given over to large format retail units. The redevelopment of such a site provides a rare opportunity to create a new and meaningful piece of urban design with a positive contribution to the city.

8.20 There is an identified need for high quality purpose-built technology and life science workplace buildings within Cambridge and the city centre. Located between the two railway stations and adjacent to the city centre, this site represents an ideal location to bring forward an urban scale proposal that would ensure the long-term sustainable use of the site.

8.21 Sustainability is a key driver for the project with aspirations for exemplar environmental credentials including all buildings achieving at least BREEAM Excellent, a substantial biodiversity net gain and the adoption of an energy strategy that utilises a fabric first approach, to enable a holistic response to climate emergency.

8.22 The key objectives for the site set out in the Planning Performance Agreement include:

- Deliver an exemplar of sustainable development and help the city meet its climate change objectives;
- Repair the urban fabric of this part of the city, integrate it into its surroundings; "green" the site and provide substantial areas of high quality, multifunctional public realm;
- Deliver an accessible, exceptional quality cycle and pedestrian environment;
- Optimise development on this brownfield site and deliver high quality buildings and spaces for the knowledge industry in a town centre environment; and
- Enhance and diversify the range of employment opportunities on site.

8.23 These aims and objectives are fully secured through the application scheme, which went through several key stages including a major review in 2024 leading to an amended application.

[105] CD1.00 and 2.00

8.24 The officers' report to committee[106] stated that the amendment to the scheme had taken significant strides to address masterplan, massing and height issues including reductions in the height and modulation of buildings, the provision of better defined and larger open spaces and improved walking and cycling routes. Concerns regarding matters of townscape and heritage remained, but it was recognised that to accommodate the aspirations of Government policy to deliver meaningful growth, particularly in economic terms on brownfield sites such as this, a significant degree of change and densification of the site would be inevitable. Officers were of the view that the overall public benefits of the scheme outweigh the heritage and townscape harms identified.

8.25 Turning to the matters the on which Secretary of State particularly wishes to be informed.

Applicant's case in respect of Matter 1: Building a strong competitive economy

8.26 The principle of development is agreed between the main parties, including the comprehensive redevelopment of the site and the mix of uses set out in the outline scheme. It is agreed that the scheme complies with policies aimed at building a strong competitive economy. The proposals are consistent with national planning policies set out in NPPF Chapter 6.[107] They would meet identified needs and give raise to a very substantial range of economic benefits locally and nationally.

8.27 There is agreement between the main parties that the scheme would meet unmet needs in Cambridge. The committee report says this, and it is also set out in the Statement of Common Ground.[108]

8.28 As set out in the Applicant's Planning Rebuttal document[109], the way that the scheme would meet unmet needs should be accorded great weight. The scheme is targeted at, and would meet, specific identified needs in Cambridge.

8.29 There is a minor difference of opinion between the Council and the Applicant about the quantitative need for offices and labs when comparing the recent Iceni reports in Cambridge. The Iceni report is probably over-conservative when assessing the quantitative need for offices and labs. Iceni predicts[110] office need to 2041 at 289,700 square metres, research and development at 600,000 square metres and industrial/warehousing at 200,000 square metres. However, this does

[106] CD3.01 paragraph 30.34.

[107] Ibid paragraph 9.2(a).

[108] Ibid paragraph 7.20.

[109] CD 7.21, page 17.

[110] CD9.12.

not account for the scale of the Government's ambitions over the same period, for growth in these sectors in Cambridge.

8.30 The underlying job forecast, which is a major driver of the floorspace estimates, appears conservative. The Cambridge and Peterborough Independent Economic Review was for growth of 115,500 jobs over the period 2021-2041; but Iceni only expect 63,800, a number that the University of Cambridge's Futures Modelling team felt to be modest.[111]

8.31 The higher prediction is corroborated by the University's Centre for Business Research which indicates an annual job growth rate of 4% between 2018 and 2024, significantly higher than the 1.5% prediction by ONS, on whose work Iceni relies, since it forms a key calibrating input into the Cambridge Econometrics work Iceni uses[112.]

8.32 The Iceni work does not account for suppressed demand. That there is such demand is undisputable on the data[113].

8.33 The need to replace stock is not taken into account to the extent that would properly reflect the need to incorporate a replacement allowance[114].

8.34 On the supply side, the pipeline is overstated because the numbers relied on by Iceni[115] do not adequately consider practical delivery challenges. The data shows a large gap between permissions and sites which are being built out. Of the space with full reserved matters consent, only 19% was under construction in March 2024; over-reliance on consented floorspace is even more precarious, when the pipeline contains so many very large sites.

8.35 The Applicant's approach to the quantitative need for the scheme should be preferred to the figures from Iceni that are quoted by the Council. The officers' report notes that there is a shared understanding between Council and Applicant that there are, and will continue to be, significant challenges in achieving a balance between the needs of the life science and information and communications technology 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.

[111] CD7.16 paragraph 5.24 page 24.

[112] Ibid paragraph 5.26.

[113] Ibid paragraph 5.29

[114] Ibid paragraph 5.32 and Table 5.

[115] Ibid Table 5.2 page 28

8.36 The officers' report accepted that demand for high quality office space would be likely to outstrip short-term supply in the city; that lab space availability is currently underprovided in the city; and that start-up and scale-up space remains acutely underprovided across the Cambridge region. It also recognised the inherent challenges in delivering physically available and viable floorspace in the short to medium to maintain the Cambridge region as a national and global destination for life sciences and information and communications technology research in the longer term.

8.37 There is very little if any difference between the main parties on the extensive benefits that the scheme would bring in economic terms.

8.38 The scheme would secure investment and talent. Providing high quality, well located research and development spaces will enable Cambridge to continue to attract global businesses, supporting local and national economic growth.

8.39 The dedicated Employment and Skills Strategy, featuring a dedicated Science, Technology, Engineering and Mathematics educational space, proactive local outreach, Real Living Wage commitments where practicable, and an Employment and Skills Coordinator, will significantly enhance local employment and training, especially benefiting disadvantaged residents.

8.40 The scheme would directly meet unmet need for office and research and development in an excellent, accessible location. It would broaden genuine market choice and explicitly support start-ups and scale-ups, aligning with NPPF priorities for knowledge-intensive sectors.

8.41 It would inject competition and optionality into the Cambridge market by adding a highly accessible, mixed-use research and technology hub that aligns more closely with the qualitative demand than many pipeline schemes thus offering a preferable and deliverable choice for occupiers. This competition between locations keeps the market fluid, accelerates delivery and reduces the risk that foot-loose firms divert investment overseas. Accordingly, the quantitative targets and Iceni analysis should be viewed not as caps but as reference points within a dynamic economy, where a diversity of site, location and offer combinations is essential to satisfy demand and maximise job creation.

8.42 The development would reinforce Cambridge's status as a globally significant innovation ecosystem, directly enhancing productivity through network effects and knowledge spillovers. It would secure investment and global talent that would otherwise be attracted to international competitors such as Boston and the Bay Area, fully supporting the government's ambition for growth in the Oxford–Cambridge innovation corridor.

8.43 The development would bring considerable economic and fiscal benefits by delivering approximately £600 million annually in additional Gross Value Added and £180m to £240m in tax revenue.

8.44 Life science and technology sectors are key priorities identified in the Government's 2024 Industrial Strategy. The Proposed Development strengthens the UK's position at the forefront of these critical, high-growth industries, which

not only creates immediate economic impacts but supports long-term innovation capacity and global competitiveness.

8.45 The scheme would deliver social value; the local community would benefit from substantial social infrastructure improvements, including youth facilities, inclusive open spaces, active community hubs, and initiatives designed with local stakeholders, enhancing social cohesion.

8.46 These points all affect the local area first and should be given substantial weight overall.[116]

8.47 However, they are also important in national planning and the achievement of wider NPPF goals. Cambridge is one of the few places in the UK which is net positive in Gross Value Added terms, contributing £1bn more than it absorbs per year. This is important because the UK has struggled with poor productivity growth since the 2008 financial crisis. The Resolution Foundation found that in the 12 years following the crisis, labour productivity grew by just 0.4% per year in the UK, less than half the average rate of 0.9% in the richest OECD countries. The productivity gap between the UK and France, Germany and the US has doubled since 2008, reaching 18%, costing the UK £3,400 in lost output per person annually[117].

8.48 Productivity growth is key because it is a primary driver of long-term economic growth and improvements in living standards. As productivity increases, society can produce more goods and services with the same amount of work, leading to higher incomes and enhanced quality of life. It is no surprise therefore that economic growth is the number one mission of the Government[118.] The government is aiming for the highest sustained growth in the G7, supporting more people in good jobs, higher living standards and driving productivity growth in every part of the UK.

8.49 Investing in economic growth in Cambridge is therefore likely to maximise the chances of successful economic outcomes. Greater Cambridge is one of the UK's most vital economic assets, home to the largest life sciences cluster in Europe, world-class research institutions, and emerging sectors like artificial intelligence, genomics, and semiconductor design[119]. The Greater Cambridge economy generates over £50bn annually, represents Europe's fastest-growing technology sector, and supports vital enabling industries, including manufacturing, data storage, and logistics. The economy is a net contributor of

[116] CD7.21, page 17

[117] CD7.16 page 6

[118] CD9.29

[119] CD9.14

£1bn to the Treasury, making it a global hub of innovation and a cornerstone of the UK's growth strategy[120] .

8.50 The Government reaffirmed on 28 August 2024 that Greater Cambridge has a vital role to play in this Government's mission to kickstart economic growth. The Cambridge Growth Company has been tasked with identifying the growth capacity of the city region[121] .

8.51 It is agreed with the Council that there is no policy basis for requiring residential development on the site. Furthermore, given the very substantial residential growth being planned for around Cambridge both in the emerging plan and the Cambridge Growth Company direction of travel, there is no economic or planning issue relating to the jobs that would be created by the application scheme detrimentally affecting the City or region's housing targets or provision.

8.52 For these reasons, the scheme represents a clear, substantial positive contribution to the local and national economy in line with chapter 6 of the NPPF.

Applicant's case in respect of Matter 2: Ensuring the vitality of town centres

8.53 The scheme would not harm the vitality of any town centre. Retail matters are all agreed with the local planning authority and are included above under the heading "Agreed Matters".

Applicant's case in respect of Matter 3: Creating well designed places

8.54 This topic includes townscape and making best use of previously developed land, heritage effects and the issue of neighbouring living conditions.

Townscape and making best use of previously developed land

8.55 The current Beehive Centre is a series of utilitarian retail sheds fringing a large car park. The Council itself considers that the overall vision of transforming an underutilised, car park dominated retail park into an accessible, inclusive, place-based innovation cluster, which incorporates a network of public open spaces and connectivity routes, is positive and supportable.[122]

8.56 The Council's reservations on design were very largely related to the objection on residential amenity grounds, which it would no longer maintain if the condition as discussed at the inquiry was imposed. In its statement and evidence the Council has acknowledged that paragraphs 135(c) and (f) of the NPPF – those dealing with living conditions and residual townscape effects – would be adequately met based on the Illustrative Scheme condition. The up to date position is therefore one of unanimity in relation to main issue 3. Issues remain between the parties

[120] CD9.30.

[121] CD9.19.

[122] CD7.02 paragraph 4.165.

over the extent of harm to living conditions based on the parameter plans and townscape, although the Council have never claimed that the residual townscape effects as they saw them were sufficient for permission to be refused.[123]

8.57 The design of the scheme would achieve a transformational change in placemaking on the site.

8.58 There would be a very significant change in quality at the Coldham's Lane entrance to the site, where a new, pedestrian and cycle friendly roundabout junction would replace the rather unpleasant junction that occupies that space at the moment. There would be well designed buildings on Plots 1 and 2, with a large space heavily planted with trees entirely changing the experience of entering the site for the better.

8.59 At ground floor, the public realm would be interesting, varied, much greener, and with active frontages along each building. Even the mobility hub would offer a range of visual and function interaction with the public realm, due to the space reserved there for community uses. The larger spaces, Hive Park and Maple Square would become genuine city spaces, with shops and other ground floor uses around attractive civic spaces for those in the wider locality to use and enjoy. Threading through these spaces would be routes for pedestrians and cyclists which would all comply with guidance on separation, safety and useability.

8.60 The buildings themselves, whilst larger and more imposing than the sheds of the current Beehive Centre, would be of exemplary quality due to the requirements of the Design Code. The Illustrative Scheme gives an accurate impression of the kind of environment that would be created. It would achieve the full set of design policy requirements set out in NPPF paragraph 135.

8.61 Paragraph 135(e) of the NPPF requires decisions to ensure that developments "optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks". The idea of optimisation has a particular force when sustainable, previously-developed land is the subject of consideration. There is a direct connection between NPPF paragraph 135(e) and the new (December 2024) paragraph 125(c), which provides (in relevant part) that decisions should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused."

8.62 The Council considers that with the daylight, sunlight and overshadowing condition in place the scheme would meet paragraph NPPF 125(c) because there would not be, in the Council's judgement, "substantial harm". That was an

[123] IQ.1 paragraph 2.

important clarification because it explains why the Council now considers that permission should be granted.

8.63 It also explains why the Council considers that (again, subject to the condition), the scheme would optimise the re-use of the site. The Council's planning witness gave evidence that, with the condition in place, the additional sense of enclosure or over-dominance that residents might experience in their gardens, did not amount to sufficiently negative effects to alter the overall view that permission should be granted.

8.64 The scheme would strike a balance between the buildings and the spaces between them, and also between the proposed buildings and existing neighbours. A great deal of work has gone in to calibrating that balance between best use of the site and sufficient distances, intervening planting and angles. The Illustrative Scheme is tantamount to the fullest manifestation of the scheme in any event, and there is no residual point to be made by way of distinction between the parameter plans scheme and the Illustrative Scheme. The development would be a very high-quality new piece of townscape in Cambridge.

8.65 There would be only two instances of townscape harm, both relatively minor.[124] Firstly, the view from the middle of Coldham's Common looking towards the City, and secondly for nearby residents. The basis for this harm is the additional mass and height, causing a slightly more urban experience from the middle of Coldham's Common and a slightly more intense form of urban scene for those living in the nearby housing.

8.66 The harm is judged minor because the site is generally recognised to constitute poor townscape at the moment, and the additional mass or height would be perceived as part of the layered townscape of the City's urban area. The layered effect of smaller two storey housing on the edge of Coldham's Common with the more urban part of the City lying behind and above that housing might be thought appropriate to a compact city as sought by the Council in its vision for Cambridge in the adopted plan.

8.67 There is no harm to the townscape of wider Cambridge. Visibility does not amount to harm. The amended scheme as it emerged in mid-2024 made a concerted effort to modulate overall heights and to create a composition which gathered perceptible height in the centre of the site and avoided an unrelieved flat topped mass. The visualisations from Castle Hill Mound, from Redmeadow Hill and from Lime Kiln Road all show the same effect – an additional feature, on the periphery of urban Cambridge, which in some views would be seen to break the skyline but which would hardly stand alone in doing so.

8.68 The Cambridge skyline only really manifests itself from those same three viewpoints, one of which, Redmeadow Hill, is a very long way away. The scheme would not dominate the view from those locations, or occupy anything more than

[124] CD7.18 p45, Table AM7 Summary of Visual Effects.

a clear position on the periphery of the city, where new development is already clearly perceived.

8.69 Of huge importance is the quality and distinctiveness of what would be seen. Here the Design Code is critical, and the way that the flues are grouped and designed. They are the marker of the Life Sciences nature of the scheme, and of 21st Century Cambridge – several notable examples already exist in Cambridge. To the extent that the scheme would be perceived in the wider views, the flues and the massing of the buildings would clearly announce the nature of the scheme, reinforcing the legibility of the City and its special identity (and value to the country). It is a good example of why the visibility of new development is not always to be treated as an adverse impact, even where there is a change to existing character.[125] Here, it is not the case that Life Sciences buildings with larger mass and a characteristic skyline would be new and alien to Cambridge; they are already part of its character.

8.70 The scheme would comply with paragraph 135 of the NPPF[126], which requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities.

8.71 The proposals would accord with Policy 57 of the adopted Local Plan[127], since the scheme would have an overwhelmingly positive effect on its setting in terms of height, scale and form, materials and detailing, ground floor activity and wider townscape and landscape impacts. Policy 60 of the adopted plan would be met because the scheme would meet the policy criteria for tall buildings, including location and context, impact on the historic environment, scale, massing and architectural quality, amenity and microclimate, and public realm.[128]. Policy 67, mentioned in the putative reasons for refusal, concerns the protection of open space, but the scheme would provide a range of new open spaces, so that policy does not apply at all.

Heritage

8.72 As regards heritage, the Council's and Applicant's heritage assessments are very similar. There would be a set of very low less than substantial harms[129] to six assets.

[125] CD7.18 paragraph 3.2.11

[126] CD7.18 pp36-37, Table AM4.

[127] Ibid, p38 paragraphs 5.3.1-2.

[128] Ibid, Table AM5, beginning on p38

[129] CD7.06, p31, Table 6

8.73 The only near-at-hand heritage impact would be to the Mill Road Conservation Area.[130] Historically, the character of the site has always been different from that of the conservation area and the wider historic core of Cambridge. It has never aesthetically integrated with it and has always been an island site on the edge of the city core. As it stands, the site makes a negligible adverse contribution to the setting of the conservation area, as a result of its limited-quality buildings, which relate poorly to their context in style, materials and orientation.

8.74 The scheme makes the most of the opportunity to masterplan the site to form a development that relates more positively to its surroundings. The scale of the proposed buildings would be greater than that of the existing buildings, which would result in a partial reduction in openness from some vantage points, but it should be noted that as one moves around the conservation area, views of the site differ and, in many cases, the view is not apparent.

8.75 The south-western boundary of the site has a more direct visual relationship with the conservation area. Here, the scheme would replace the two large units located on the south-western boundary of the site with new buildings, of varying height and set behind a green buffer, and a large park. The landscaping would create a buffer between the conservation area and the proposed development and would result in the proposed built form sitting further back from the York Street junction. This would ensure that there was a clear spatial definition between the scheme and the conservation area as seen from the junction of York Street and Ainsworth Street.[131] Two or three of the proposed buildings would be seen in this one view. They would be very largely invisible from the majority of the conservation area.[132.] The new buildings would not overtop the roofs of the housing but would occupy an area which is relatively recessive. The impact on the setting of the Mill Road Conservation Area would be negligible adverse, and the impact on significance would be at the lowest level of less than substantial harm.

8.76 The other five instances of very low or negligible less than substantial harm all arise in views from Castle Hill Mound. The reason for the harm relates to the intrusion of the scheme into views in which the asset in question also appears. The view from Castle Hill Mound is a large panorama in which the majority of the heritage assets lie straight ahead in the view, whilst the scheme lies to the left, in a peripheral position. The scheme would be clearly distinct from the assets, and legible as a piece of 21st Century Cambridge. If there is harm, it is at the very lowest end of the spectrum, hardly interfering in any perceptible way with what is of value, or significance, in those assets.

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[130] CD7.06 pp20-22

[131] CD7.07 Appendix 3, p6, Figure 8.

[132] CD7.07 Appendix 3, p6 Figure 9 shows a distant view looking from the edge of the conservation area over the top of St Matthews' Gardens, which is not itself in the conservation area.

8.77 In each of these five instances, the effect on the Cambridge Central Conservation Area, Castle and Victoria Road, All Saints Church, Jesus College Chapel and Christ Church would be negligible adverse, with the lowest level of less than significant harm to the heritage asset.[133]

8.78 The Applicant does not agree with the Council that the degree of harm to the above six identified assets would be slightly greater than this. The Council's evidence in this regard was not capable of being tested through cross-examination and in any case the Council found less than substantial harm and did not maintain an objection to the scheme.

8.79 In addition, the Applicant does not agree with the Council that more assets would be harmed. These assets are Mill Road Cemetery, King's College Chapel, St Mary the Great, St John's College, the University Library, Kite Conservation Area and Riverside and Stourbridge Common Conservation Area. The Applicant maintains that in each of these instances the scheme would have a neutral effect upon the setting and significance of the asset. The Appellant does not accept the Council's position that there would be "cumulative" harm.[134]

8.80 Therefore, whilst the conservation of the significance of these highly-graded designated assets is something to which great weight should be given, the degree of harm here would be at worst very low indeed in the less than substantial harm spectrum. It is agreed between the parties that it would be outweighed by the scheme's public benefits.[135]

8.81 There is no non-designated Heritage Asset identified by the Council in any list. The Porcelanosa building, whilst having a certain idiosyncratic charm, is a recent commercial building without identifiable design or heritage significance, in that there is nothing to set it apart in terms of architectural quality, history, materials or technique. Even if it were treated as a non-designated heritage asset, it would go into the balance of considerations.

Daylight, sunlight, overshadowing and outlook

8.82 The Daylight and Sunlight Report dated August 2024[136] carried out a detailed assessment of the potential daylight and sunlight effects of the current application scheme on neighbouring properties. An Addendum Report was produced in November 2024[137] which responded to queries raised by the Council in respect of potential effects to properties at Silverwood Close and St Matthews Gardens. The Daylight and Sunlight Report and the Addendum Report and Appendices

[133] CD7.06 p22

[134] CD7.06 pp22-29

[135] CD6.03 paragraph 7.39

[136] CD2.31

[137] CD2.63

summarise the impacts of the parameter plans and Illustrative Masterplan on a case-by-case with illustrations and technical appendices.

8.83 Relevant information from these reports is included in the Applicant's proof of evidence[138] and Daylight and Sunlight Appendices.[139] These provide a clear and accessible summary of the technical evidence. This evidence was not cross examined by the Council or any interested party during the inquiry.[140]

8.84 The BRE guidance outlines two detailed methods for calculating daylight within properties neighbouring a proposed development: the Vertical Sky Component (VSC) and the No-Sky Line (NSL) tests.

8.85 The VSC test measures the amount of sky that is visible on the outside face of the external walls, usually at the centre point of a window. Where a room is served by multiple windows, an 'area-weighted' Vertical Sky Component may be derived for the room based on the size of each window, subject to the methodology within the BRE Guide.

8.86 The NSL test calculates the distribution of daylight within rooms by determining the area of the room at desk / work surface height (the 'working plane') which can and cannot receive a direct view of the sky and hence 'sky light'.

8.87 Accurate calculation of the NSL requires an understanding of the room layouts whereas VSC requires modelling only of the window position (although VSC on a 'room weighted' basis does require provision of further details).

8.88 For the above methods, the guidance suggests that existing daylight may be noticeably affected by new development if:

- windows achieve a VSC below 27% and are reduced to less than 0.80 times their former value (para. 2.2.7); and / or:
- levels of NSL within rooms are reduced to less than 0.80 times their former value (para 2.2.11).

8.89 Bandings of numerical loss and are commonly applied in respect of environmental impact assessments[141]. The significance of banding relates solely to the extent of numerical reductions and provide no indication of the quality or adequacy of the retained amenity levels.

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[138] CD7.08

[139] CD7.09

[140] However, neighbouring residents maintain their concerns over the degree of harm arising from the proposals. There is also a difference between the Applicant and the Council in respect of the degree of harm arising from the parameter plan scheme and the Illustrative Masterplan scheme.

[141] CD7.08 pp18-19

- A 0% to 20% reduction, or where BRE absolute targets are met, may be reported as either BRE compliant or a negligible effect;
- a 20.1% to 30% reduction is reported as a minor adverse effect;
- a 30.1 to 40% reduction is reported as a moderate adverse effect; and above
- a 40% reduction is reported as a major adverse effect.

8.90 Appendix H of the BRE Guidelines gives further advice on significance where the loss of skylight or sunlight does not meet the guidelines.[142] It states that factors tending towards minor impact include situations where:

- only a small number of windows are affected;
- an affected room has other sources of skylight;
- the affected room has only a low level requirement for skylight; or
- there are other reasons why an alternative, less stringent guidelines should be used, for example an overhang to a window, or where a window is unusually close to a boundary.

8.91 Factors tending towards a major impact include:

- where a large number of windows are affected;
- the loss of light is substantially outside the guidelines;
- all the windows of a particular property are affected; or
- where the affected space has a particularly strong requirement for skylight or sunlight.

8.92 There are precedents in planning appeals for accepting alternative lower figures for retained VSC. Some appeal decisions have adopted alternative benchmarks of 16% for bedrooms and 18% for living rooms.[143] There are local examples of figures considerably below the BRE Guidelines.[144]

8.93 As regards sunlight, the Annual Probable Sunlight Hours (APSH) test calculates the percentage of probable hours of sunlight received by a window or room over the course of a year. In assessing sunlight effects from the proposal to neighbouring buildings, the review relates to windows facing within 90 degrees of south with focus upon main living rooms and conservatories. The BRE guide provides an annual target of 25% APSH with at least 5% achieved between 21st

[142] CD7.08 pp19-20

[143] CD7.08 9.1.7 to 9.1.20

[144] CD7.08 paragraphs 9.1.21 to 9.1.51

Sept and 21st March ('winter sun'). Occupiers may notice the loss of sunlight if the APSH, is reduced below 25% APSH and less than 0.80 times former value and for 'winter sun', if reduced below 5% of APSH and less than 0.80 times former value; and also having a sunlight reduction for the whole year greater than 4% APSH (para. 3.2.7).

8.94 As regards amenity areas, a 2-hour 'sun on ground' test is recommended for quantifying sunlight availability with a decrease in available sunlight indicating greater shading from development. The guidelines suggest that if at least 50% of an amenity area receives at least 2hrs of sun on 21st March, then it is likely to be adequately lit throughout the year. If open space receives less than 50%, then the guidelines suggest that the loss in sunlight may be noticeable if it is reduced below 0.80 times its former value.

8.95 The properties that are regarded as most sensitive are discussed below.

8.96 157-161 St Matthew's Gardens: these are the ground and first floor flats to eastern end of St Matthew's Gardens terrace. Under the parameter plans, 157 would experience a minor VSC deviation to a single ground floor living space and no material effect on NSL. 161 would experience a moderate VSC deviation to a single first floor living space. There would be no material effect on NSL. Retained amenity levels of over 25% VSC would be very good. All other rooms would meet the absolute target of over 27% VSC. Overall use and amenity of the space would not be materially impacted. Trees / bushes to the boundary would reduce the perception of light loss. Not all rooms to this property would experience change since the northern elevation would be unaffected. Sunlight levels would fully meet the APSH sunlight test. Retained amenity resulting from the parameter scheme is considered to be adequate.

8.97 As regards the Illustrative Scheme, there would be no material harm.

8.98 Flats at 163-165 St Matthew's Gardens: these are ground and first floor flats to the eastern end of the St Matthew's Gardens terrace. The properties enjoy higher existing VSC levels due to the relationship with the open car park, with the result that they would experience more significant numerical reductions to VSC. Under the parameter plans, the retained amenity levels of c.20% - 23% to living / kitchen / dining space would still be appropriate and would not affect their use. There would be only minor shifts in NSL to the living spaces. The retained VSC to the ground floor bedroom would remain good at c.20% and it is a less sensitive room use. The retained VSC to the first floor bedroom would be lower at 14.4%, but this would be a single less sensitive room use and is more likely to register a lower figure because it is closer to a deep eaves above. Not all rooms to this property would experience change as a result of the proposals since the northern elevation would be unaffected. Retained levels would be adequate such that the use of spaces would be unlikely to be materially affected. Sunlight levels would fully meet the APSH sunlight test. Mature trees and bushes to the boundary would reduce the perception of light loss and limit the effect on the pattern of use of these properties.

8.99 Under the Illustrative Scheme there would be retained levels of c.24% VSC for living space and c.19% for bedroom space. These are appropriate and demonstrate the effectiveness of design controls in further minimising effects.

8.100 Townhouse at 167 St Matthew's Gardens: this is a two-storey house to the eastern end of the St Matthew's Gardens terrace. The property currently enjoys higher existing VSC levels due to the relationship with the open car park. As a result, it would experience greater numerical reductions to VSC from this higher starting point. VSC and NSL changes may be noticeable. Under the parameter plans, a retained amenity level of c.20% to the kitchen space would be good and would not affect the use of the spaces. The retained VSC to the bedroom would be lower at 14.1% but this would be a less sensitive room use. The first floor bedroom window is closer to a deeper eaves above. It is also in close proximity to boundary vegetation which would reduce the perception of light loss and limit the effect. The northern elevation, including the main living space, would be unaffected. Sunlight levels would fully meet the APSH sunlight test. Retained amenity resulting from the parameter scheme is considered to be adequate.

8.101 Under the Illustrative Scheme, the corresponding retained levels would be over c.24% VSC for living space and c.18.4% for bedroom space. These are appropriate and demonstrate the effectiveness of the design controls in further minimising effects.

8.102 Townhouse at 169 St Matthew's Gardens: this is another two-storey house to the eastern end of the St Matthew's Gardens terrace. Again, the property enjoys higher existing VSC levels due to the relationship with the open car park and experiences moderate to major numerical reductions to VSC as a result of this higher starting point. Under the parameter plans, VSC shifts may be noticeable but retained amenity levels of c.18 – 21%% would be good for the habitable room uses and would not affect the use of the spaces. There would be no material change to daylight penetration to the bedroom spaces and limited impact to the living room. Mature trees / bushes to the southern and eastern boundary would reduce the perception of light loss and limit the effect on the pattern of use of this property. Not all rooms to this property would experience change as a result of the proposals with the northern elevation being unaffected. Sunlight levels would fully meet the APSH sunlight test.

8.103 The Illustrative Scheme would have less impact with higher retained levels of c.22% VSC and above.

8.104 Townhouses at 171-175 St Matthew's Gardens: these have a sunken lower ground floor adjacent to the retaining wall of the Beehive Centre car park. The rooms currently enjoy higher existing VSC levels, particularly to the upper floors, due to the relationship with the open car park. They would therefore experience moderate to major numerical reductions to VSC as a result of this higher starting point. The lower ground floor level of 175 has been altered following construction to provide a dual aspect combined living / kitchen / dining space. Whilst VSC shifts may be noticeable the NSL changes only affect the lower ground floor sunken levels with the upper floor living spaces and bedrooms fully meeting the BRE targets. Retained amenity levels of c.19% - c.20% under the parametet

plans are good for the main living rooms at ground floor and would not affect the use of the spaces. There would be no material change to daylight penetration to the living room or bedroom spaces. The lower ground level dining rooms / kitchens would experience moderate effects to VSC but would retain similar VSC levels to the pre-existing conditions in the neighbouring lower ground floor living space at 177 /179 St Matthew's Gardens (c.12 – 13% VSC) as well as other examples of lower pre-existing levels around the application site and elsewhere in Cambridge.[145] Mature trees / bushes to the boundary and the level change / enclosure to the lower ground floor space would reduce the perception of light loss and limit the effect on the pattern of use of these properties. Not all rooms to any one property would experience change as a result of the proposals, with the northern elevation being unaffected. Sunlight levels would fully meet the APSH sunlight test. Retained amenity resulting from the parameter scheme is considered to be adequate.

8.105 The Illustrative Masterplan scheme would result in minor or moderate VSC changes to the constrained lower ground rooms. For all the indicated rooms retained VSC would be between two and four percentage points better than under the parameter plans.

8.106 177-201 St Matthew's Gardens: these flats are positioned to the centre of the terrace. They have a sunken lower ground floor with the living space of 177 and 179 facing into this sunken terrace. The upper floor flats have bedrooms, but no main living rooms, facing the site. The lower ground floor living spaces already experience lower VSC levels of between 12% and c.13%. The additional VSC reductions resulting from the scheme are negligible. NSL changes are exacerbated in percentage terms by this lower starting point and the sunken position of these rooms. The bedrooms at ground floor and above have higher pre-existing amenity and so experience greater and more noticeable potential change to VSC and NSL levels. Retained amenity levels of c.18% and higher are appropriate for the bedroom uses at ground floor and above. Whilst there would be NSL changes to these bedrooms, they are a more secondary space and this would not affect the enjoyment / pattern of use of these rooms. The lower ground floor rooms are already somewhat compromised both in outlook and quality. Further VSC changes are compliant with BRE base targets and would be unlikely to have a material effect on the use of these spaces. The mature trees and structures bin stores / structures within the terrace limit outlook from these lower ground floor units which would reduce the perception of light loss and limit the effect on the pattern of use of these properties. The majority of sunlight levels fully meet the APSH sunlight test (see 14 below). Retained amenity resulting from the parameter scheme is considered to be adequate.

8.107 The Illustrative Masterplan scheme would reduce the impact on retained VSC and NSL in a number of instances from major to moderate or from moderate to minor, with gains in retained VSC of 2 to 3 percentage points.

[145] CD7.08 paragraph 9.1.47 and Table 1

8.108 203 St Matthew's Gardens: the VSC impacts would be minor in nature. The retained VSC levels of over 20% under the parameter scheme would be acceptable for the specific room use. The lower ground floor would have a lower retained VSC of c.17% but the reduction to this room would fully meet the BRE guidance so is not considered to be material. Mature trees and bushes to the boundary and the level change and enclosure to the lower ground floor space would reduce the perception of light loss. Not all rooms would experience daylight loss to this property. Sunlight levels would fully meet the APSH sunlight test. Retained amenity resulting from the parameter scheme is considered to be adequate.

8.109 The impact of the Illustrative Masterplan on VSC would be negligible.

8.110 As a general comment on the impacts on St Matthew's Gardens, the greatest effect of the proposals would be to the properties between 163 and 201 St Matthew's Gardens. These properties currently adjoin the open car park of the Beehive Centre. However, there are also mature trees and bushes to the boundary which would limit the perception of light loss.

8.111 A number of the St Matthew's Gardens properties have sunken lower ground floor levels as a result of the level change to the Beehive Centre car park and the retaining wall. The numerical VSC effects to these lowest floors are generally lower than those to the ground floor rooms due to the more limited sky view from these sunken spaces. Retained VSC levels are also reduced given the lower starting point and more constrained position of these windows.

8.112 The ground floor spaces to these properties experience generally the largest numerical change as a result of their currently more open aspect. This affects a mix of bedrooms to the flats at 177 – 201 St Matthew's Gardens and living rooms to the townhouses at 167 – 175. Despite this change the retained VSC levels are 19-20% VSC or above for the living spaces.

8.113 The only main living rooms that would experience lower retained VSC levels are the lower ground floor flats at 177 and 179 St Matthew's Gardens but the change here would be limited. The VSC reductions would meet the BRE targets although there would be more significant NSL deviations under the parameter plans. The dining and combined dining / kitchen spaces at 171, 173 and 175 St Matthew's Gardens are within the more constrained lower ground floor terraces and are limited by both the existing garden fences and retaining wall to the application site. These areas already have lower existing VSC levels which increases the subsequent percentage VSC reduction. The impacts of the parameter scheme are 'moderate' in terms of the VSC reduction significance. The retained values of between c.12.5% - 15% VSC under the parameter plan fall below the alternative levels of 16% - 18% and may be noticeable to the residents. These impacts are however very localised affecting three rooms and resulting from the specific constraints to the sunken windows. There are similar pre-existing VSC levels to the properties at 177 / 179 St Matthew's Gardens and other precedents identified around the site and in Cambridge. Other areas of greater numerical impact include the upper floor bedrooms of 165 and 167 St Matthew's Gardens which retain VSC of c.14%. These windows have a more direct view of the Beehive

Centre and are somewhat sensitive due to the design of these properties which positions the windows closer to the overhanging eaves which blocks some sky visibility due to the proximity to the roof soffit above.

8.114 34-39 Silverwood Close: these are two and three storey houses. The properties have an existing view to the open car park and would experience predominantly minor to moderate numerical reductions to VSC as a result of the higher starting point. The properties at 38 and 39 Silverwood Close have extended living / kitchen / dining space at ground floor. Whilst individual windows would experience change, the spaces are heavily glazed and include rooflights such that overall amenity remains high. 36 Silverwood Close would experience major impacts to NSL, moderate VSC impacts to kitchen and bedroom and major VSC impacts to a dining room but retained VSC would still be between 17.8% and 21.7%. The changes would affect windows that are alongside an extension or are NSL changes within the deeper plan extension itself. These would be appropriate for use of these spaces. Main living rooms would retain compliant VSC in excess of 27%. Mature trees to the boundary would reduce the perception of light loss and limit the effect on the pattern of use of this property. There are fewer trees to the boundary of 39 Silverwood Close, but this property has a larger garden enjoying light and outlook from multiple aspects. Not all rooms to the properties experience change as a result of the proposals with the northern elevation, including main living spaces, being unaffected. Sunlight levels would fully meet the APSH sunlight test and the majority of gardens would meet the 2+ hours sun on ground test. Retained amenity resulting from the parameter scheme is considered to be adequate.

8.115 Under the Illustrative Scheme, retained VSC would generally be in the mid 20%s (albeit with the kitchen of 36 having a retained VSC of 18.7%). This illustrates the effectiveness of design controls in further minimising effects under future reserved matters applications.

8.116 As a general commentary on the impacts on Silverwood Close, the majority of the Silverwood Close properties face the undeveloped open car park element of the existing Beehive Centre, or the car park adjacent to the Porcelanosa unit. A degree of change is to be anticipated in respect of the currently open site, but the shift in daylight levels would generally be limited. The vast majority of the numerical effects to VSC at Silverwood Close would be negligible, with only localised minor or moderate deviations from the numerical targets. NSL changes may be more noticeable to the central units between 34-39 Silverwood Close. However, whilst the changes may be perceptible, the retained amenity levels of c.18% VSC or over are adequate and will not materially impact the use of the spaces. The majority of rooms would retain VSC levels of c.25% of above and main living spaces in particular would either meet the BRE targets or retain VSC levels close to the 27% target.

8.117 In considering the acceptability of the proposals in respect of Silverwood Close there are several other relevant factors. None of the affected properties experiences changes to all of their windows. All units have a front elevation and main living spaces that are not affected by the proposals. The relationship to the boundary trees would limit the perception of light loss to a number of properties.

There is also very high compliance in respect of both direct sunlight to main living spaces and the 2+ hour sun on ground targets.

8.118 The additional articulation of the Illustrative Scheme would result in reduced technical effects and a high number of properties would fully meet the BRE targets.

8.119 49-50 Silverwood Close: these extended houses are situated to the rear of the Porcelanosa Building, which would be redeveloped to form Plot 1. The effects on daylight for the parameter plans and the Illustrative Scheme would be limited except for an internal dining room window that borrows light from an extension. The fact that this is an internal window exaggerates the apparent impact.

8.120 Sleaford Street: the 3-storey properties at Sleaford Street are situated to the south-west of the site and contain windows to their eastern elevations that have an oblique view of plot 6 of the proposals. Under the parameter plans two properties show a degree of deviation from the BRE targets. The affected space at 148 Sleaford Street ground floor is a bedroom. This would maintain a VSC of c17% which is considered to be adequate for a bedroom use. The window is positioned close to the site boundary alongside the extended porch of the property, increasing sensitivity. The main living room window at ground floor would maintain an excellent VSC of 31.5%.

8.121 A first floor window would be affected at 150 Sleaford Street, but this serves a small “non-habitable” galley kitchen and is more sensitive to change because of overhanging eaves. The room would maintain a good VSC of 20% and would fully meet the NSL targets.

8.122 Overall the proposals would maintain adequate daylight to the Sleaford Street properties with only localised adverse effects. The changes would be perceptible, but the overall use and amenity of the spaces would not be materially affected. No properties suffer reductions to all of their rooms / windows.

8.123 The Illustrative Scheme would show a reduction in impacts with the kitchen at 150 becoming fully compliant with the guidance and a higher level of retained VSC to the bedroom at 148.

8.124 York Street: the 2-storey Victorian terraces on York Street are located directly to the west of the site. 37 of the 49 assessed properties are fully compliant with the BRE daylight targets in respect of both VSC and NSL. 12 properties would experience some shifts in NSL outside of the numerical targets but meet the VSC target. Where deviations from the NSL targets exist, these solely affect spaces where the design of neighbouring properties increases sensitivity due to the depth of the rooms and / or windows that are inset between neighbouring extensions. The changes may be slightly perceptible but would be unlikely to affect the use of the spaces.

8.125 Under the Illustrative Scheme the reduced height of plots 7 and 8 and the greater articulation of the upper floor setbacks would further reduce the NSL effects. Impacts would remain to four properties but the only ‘major’ adverse reduction appears to serve a non-habitable space lit by a small window at 74 York Street.

8.126 Other properties: Pym Court, Hampden Gardens and 11-17 The Terrace are all separated from the site by the railway line and are a substantial distance from the scheme. Regarding Pym Court, there would be no deviations from the BRE targets in respect of daylight, sunlight or overshadowing effects. Four windows in the upper floors of Hampden Gardens would experience minor deviations from the VSC targets and two spaces would be affected by minor NSL reductions. Overall the changes would be slightly perceptible . The Illustrative Scheme would achieve full compliance with the BRE targets. In respect of 11-17 The Terrace, there would be no adverse effect in respect of the VSC metric and 6 windows would experience minor NSL effects with one room experiencing a moderate effect. The Illustrative Scheme would be fully compliant in respect of both VSC and NSL criteria.

Summary on daylight, sunlight and overlooking

8.127 The Beehive Centre proposals are considered to be successful in limiting potential daylight effects. Whilst a degree of change from the pre-existing condition is inevitable, the majority of effects to neighbours under the maximum parameter scheme would be unlikely to be perceptible to the occupiers. More noticeable changes would be limited to the north of the site at St Matthew's Gardens and Silverwood Close, which are in close proximity to the boundary and predominantly face the existing open car park. Whilst a number of reductions exceed the base BRE targets, retained amenity remains generally high for the specific room uses. Lower retained values affect 5 rooms to St Matthew's Gardens but this is similar to pre-existing levels in close proximity to the site and evidenced in other local and appeal precedent. The Illustrative Masterplan scheme would result in more limited reductions to daylight and further increases to retained amenity of the more affected properties. This demonstrates that the effects would be successfully managed as a result of the design controls within the application. Overall the effects of the scheme are considered to be acceptable

8.128 When one looks at the low number of results in the Illustrative Scheme modelling that would fall below the BRE figure, it is no surprise that the Council now take the view that they would be acceptable. It is clear that the modelled results of the Illustrative Scheme would be acceptable in residential amenity terms and has been obvious since before the committee.

8.129 In January 2025 the Applicant had suggested that a condition could be attached to the planning permission which in effect would limit daylight, sunlight and overshadowing impacts to those of the Illustrative Scheme.[146] The Council by letter rejected the idea of such a condition because it said those effects were still unacceptable[147]. Yet the Council's daylight and sunlight expert witness stated in this proof that he had not assessed the acceptability of the Illustrative Scheme.

[146] CD11.01

[147] CD11.02 p2 bullet 1

8.130 The Council's position statement of 25 June has radically altered things. The Council has now withdrawn its daylight, sunlight and overshadowing case and its entire objection to the scheme on the basis of the condition which, in essence, is exactly the same as the one which the Applicant proposed to it before the committee in January 2025.[148]

8.131 The Council's acceptance of the condition at the inquiry did not proceed from any change to the evidence but was prompted by the question that was put by the Inspector to the planning committee councillor who spoke on Day 1. The councillor confirmed that the councillors had not looked at the merits of the Illustrative Scheme in respect of the daylight, sunlight and overshadowing results, because they believed it not to be that to which permission would attach.

8.132 It is now agreed between the Applicant and the Council that the effects of the Illustrative Scheme on neighbours in terms of daylight, sunlight and overshadowing would be acceptable. The modelling of the effects is all now agreed between the Applicant and the Council in terms of numerical values. The vast majority of windows, rooms and gardens tested do not give rise to effects which go beyond the BRE default values (and therefore by definition would not require further examination, let alone justification).[149] The proposed condition regarding daylight, sunlight and overshadowing removes this as an issue.

8.133 In the Applicant's view there should not be a daylight, sunlight and overshadowing objection even without the condition.

8.134 It is agreed that the site should be optimised for re-development. That is a crucial aspect of context for the daylight, sunlight and overshadowing judgement. It is not reasonable to treat the site as part of a suburban area where a mirror massing exercise with two to two-and-a-half storey housing is the correct comparator. The character work adopted by the Council does not treat the relevant area of St Matthews Gardens or Silverwood Close as "suburban" areas – indeed, it changed its character work from such a label to "railway corridor".

8.135 It is also not reasonable to reject the examples given by the Applicant of retained VSC values in areas of the City where optimised relationships between buildings have been achieved. That leads to the quite untenable judgement that one should apply to this site, in urban Cambridge, the default BRE figure of 27% VSC as the indicator of acceptability.

8.136 The Applicant's approach is in line with some recent considerations of this issue.[150] At Harleyford Road, the benchmarks of 16% VSC for a bedroom and 18% for a living room, kitchen and dining room were found acceptable. Against

[148] CD11.01

[149] The tabulated results are set out in full in CD7.08 from p32 onwards.

[150] See the case studies at 10.01 to 10.20

those benchmarks the vast majority of windows would be acceptable and the handful that did not mee the BRE guidelines are subject to particular constraints.

8.137 The Applicant's approach should be adopted and a finding made that the parameter plan scheme effects would be acceptable.

8.138 As regards outlook, Appendix A of the Applicant's Masterplanning proof of evidence[151] contains an analysis of building heights and separation distances, including visuals. It demonstrates that there are comparable building to building relationships in Cambridge. The buildings in the proposed scheme would be clearly visible from the backs of houses in Silverwood Close, St Matthew's Gardens, York Street and Sleaford Street, but over a significant distance, with stepping at the higher levels controlling the way that the height would be perceived. There would be a good degree of existing tree screening (some within the control of the neighbours themselves) and the ability through the reserved matters landscape details to add more. The effect would be more urban, and in some cases there would be a reduction in what is at the moment a relatively unobstructed outlook; but the scheme would not be over-dominant, or unacceptable in an urban area. The report to committee[152] recognised that to accommodate the aspirations of Government policy to deliver meaningful growth, particularly in economic terms on brownfield sites such as this, a significant degree of change and densification would be inevitable. Outlook has not been maintained by the Council as a reason for dismissing the appeal.

8.139 For these reasons the NPPF policy on residential living conditions[153] would be complied with, as would the relevant adopted local plan policies. The residual outcome overall, bearing in mind the fact that the living conditions of those nearby would be enhanced in real terms by the proximity of the facilities and amenities of the scheme, would be at the lower end of limited harm[154].

8.140 The overall conclusion on this main issue is that the Government's policy on placemaking and design would be met by the application scheme.

Applicant's case in respect of Matter d): compliance with the development plan

8.141 The development plan is generally up to date. The full list of relevant policies is in the Statement of Common Ground. The plan's Vision, and Policies 2, 40, and 55, 56, 57 and 60 are the most important in the context of this scheme. Each one would be complied with for the reasons given in the Applicant's planning proof of

[151] CD7.13

[152] CD3.01 paragraph 30.34

[153] NPPF paragraph 135(f) in particular.

[154] Policy 60 of the adopted plan refers to 'no adverse impact'.

evidence. The appendices to the Applicant's Planning proof of evidence contains a full list of development plan policies and assesses the scheme against them.[155]

8.142 It is now agreed between the parties that the development plan as a whole is complied with. The only caveat before related to the key issue of daylight, sunlight, overlooking and outlook, but the Council now takes the view that, if the relevant condition is imposed, the development plan would be complied with. The Applicant's view remains that the parameter plan scheme also complies with the development plan.

Other issues included in the Applicant's case

Sustainable transport

8.143 The effect on private car use stemming from the use of the car would be hugely positive. The Transport Assessment shows that on a weekday, the flows to the Site would fall by over 10,000, and over 12,000 on a Saturday.

8.144 There would by contrast be enhanced pedestrian and cycle connectivity through the site and the site is already well-connected to the central station and to the City Centre by those means.

8.145 There would be enhanced bus provision which would run into and through the Site itself and which would be secured through the s.106 obligation.

8.146 All this is agreed with the Council who have always acknowledged the sustainable credentials of the site. It is also agreed by the relevant statutory consultees. Full details are in the Applicant's planning evidence.

Opportunities for the community

8.147 The scheme has been designed not just to attract world-leading life science occupiers and practitioners, but to provide real benefits to those who live in the area already. Cambridge has areas of real deprivation as well as its global University and life sciences developments; Discussions with stakeholders in the area have informed certain aspects of the scheme – the science, technology, education and mathematics facility, community space, skateable route, better pedestrian and cycle route in the Beehive greenway, as well as the detailed provisions of the s106 on skills and job opportunities, which go as far as Railpen reasonably can to ensure that the scheme brings opportunity throughout its life and not just at the beginning.

8.148 Those who might be described as suffering from socio-economic disadvantages will be benefited by the scheme, as will those with mobility issues. The scheme would make movement through the areas easier and safer, and would not make life for the mobility impaired in any way more difficult. The site would be much safer, better designed for the elderly, women and girls, those with mobility or

[155] CD7.11 pp3-5

disability issues and the neurodivergent. The arrival of many more jobs on a well-connected urban site near the City centre, rather than on a fringe site near the edges of the City, is also a powerful aid to better and more sustainable living for those seeking work.

8.149 Other points are not identified as main issues but are covered in the evidence: include water efficiency, for which there is no objection from the water companies or the Environment Agency, and biodiversity net gain, which would be 20% minimum but up to 100%,

Conditions and s106 Agreement

8.150 The contents of the conditions and the s106 Agreement ensure that the scheme is acceptable and complies with the development plan. There are no areas of disagreement on those matters as between the Council and the Applicant.

Applicant's case: conclusions

8.151 NPPF paragraph 125(c) is engaged and the harm caused by the scheme would not be substantial. It is therefore agreed that permission should be granted in accordance with Government policy. There is no other identified harm in relation to townscape, heritage, or outlook that would be such as to prevent (either individually or cumulatively) permission being granted.

8.152 With the condition on daylight, sunlight and overshadowing in place, the parties agree that there is no objection to the grant of permission. On that basis the parties agree that the scheme complies with the development plan and the NPPF.

8.153 Even without that condition, the Applicant considers that the evidence is very clear that permission should be granted. The objection to the parameter plan version of the scheme is weak because it is based on a very difficult proposition: that an urban previously developed site recognised as a key opportunity to optimise a sustainable site for uses which would inevitably have the effect of reducing daylight levels below BRE default guidance to some extent should be judged by reference largely to the default 27% VSC, as if it was a suburban site where only other suburban housing was appropriate. To find that only 27% VSC or something very close to it is acceptable on sites in Cambridge would be wrong, as well as sending a dubious message to policy makers and decision takers in this critical place.

8.154 The parameter plan scheme would have an acceptable effect on residential amenity, bearing in mind the context. The scheme as a whole has been designed and amended with great care and significant engagement with local stakeholders and would create a wonderful new piece of Cambridge. It would (including in its parameter plan form) comply with the adopted plan and the NPPF and would represent another tangible step toward the growth in Cambridge that the Government wishes to see.

8.155 For these reasons, subject to the conditions and section 106 obligation, the Applicant asks for the application to be approved.

9. THE CASE FOR CAMBRIDGE CITY COUNCIL

9.1 The principle of developing this site is accepted. There would be no unacceptable highways impacts. Notwithstanding some disagreements over the extent of the heritage, townscape and visual harm which will be caused by the development, it has always been agreed that these harms in and of themselves would be outweighed by the scheme's benefits.

Council's case: daylight, sunlight, overshadowing, outlook

9.2 Had the Secretary of State not called in this application shortly before the planning committee meeting that was set to determine it, the Council was minded to refuse it for the single putative reason for refusal recorded in the committee minutes[156] concerning the impacts of the proposals on the amenity of those existing residential properties which surround the appeal site, primarily in terms of daylight, sunlight and overshadowing but also from overbearing and visual enclosure giving rise to an oppressively enclosed outlook.

9.3 The Committee's deliberations and the Council's case in preparing for the Inquiry focused on the scheme as implied by the suite of parameter plans which would, if outline permission were granted, secure the acceptable maximum parameters for the development.[157] The impacts of any proposed development must be assessed on the basis of the worst-case scenario, as represented by the application plans before the Inquiry. As this is an outline application, the worst-case scenario is that represented by the maximum parameters scheme. The local planning authority has maintained in its evidence that the worst-case scenario would give rise to unacceptable neighbouring amenity impacts.

9.4 Alongside the application, illustrative material, in the form of a masterplan, cross sections, views from neighbouring property gardens, and technical visualisations, were submitted to show one possible way in which reserved matters could come forward. This Illustrative Scheme is summarised in section 4 of Topic Paper 1 on Design, Scale and Massing.[158] Crucially, however, none of this material was proposed to be approved as part of any planning permission. The Council therefore took (and retains) the view that the Illustrative Scheme, while helpful and relevant, was (and is) not a proper basis upon which to judge the effects of the development on the amenity of neighbouring occupiers.

[156] CD3.04 p8

[157] CD2.16-2.20

[158] CD6.16

9.5 Now the position has changed. In response to the Inspector's steer[159] on the opening day of the Inquiry, the Council and the Applicant revisited discussions about the potential for a condition securing the limitation of the daylight, sunlight and overshadowing effects of the scheme to those implied by the Illustrative Scheme, to overcome the bulk of the Council's concerns and lead to a joint recommendation from the parties in favour of the grant of permission.

9.6 The Council had commissioned independent consultants at the time it was considering the application to review the submitted Daylight and Sunlight Report and addendum and this identified that the Illustrative Scheme was generally more favourable than the parameter plans. At the time the Council was not sufficiently confident that the effects of the Illustrative Scheme would be acceptable, but modelling later provided by the Applicant has provided that confidence.

9.7 The parties agree that the daylight, sunlight and overshadowing effects of the Illustrative Scheme as set out in CD7.09 would be materially less than a scheme built out to the maximum parameters shown on the parameter plans; and that the residual daylight, sunlight and overshadowing harm from the Illustrative Scheme would be acceptable in planning terms. This is something which can be included in a condition.

9.8 The Council's planning witness explained that he had always considered the scheme to be relatively finely balanced and, with the reduction of the daylight, sunlight and overshadowing harm to the levels experienced under the Illustrative Scheme, that fine balance is now tilted in favour of permission being granted. That is not to say that all of the harms of the scheme have disappeared; merely that the imposition of a condition is capable of ensuring that they can be limited to a level which is such that it does not outweigh the benefits.

9.9 The effect of the proposed condition would be that that any reserved matters application would need to be accompanied by a Daylight and Sunlight Report demonstrating, on a window-by-window, room-by-room, or receptor-by-receptor basis, that no individual VSC, NSL, APSH, winter sunlight hours or BRE 2-hour sunlight test (on 21 March) measurement would be any worse than the comparable effect as modelled in respect of the Illustrative Scheme. Overall, it would secure that none of the effects of the final scheme could be worse for any neighbouring resident than the effects of the Illustrative Scheme, which the Council finds to be acceptable overall. It would not require the delivery of the Illustrative Scheme per se: it would simply secure that any scheme that is delivered would be no worse than the Illustrative Scheme.

9.10 On the basis that the condition is agreed between the parties, the main parties to the Inquiry agree that the planning balance points to a grant of permission. For that reason, it was agreed that cross-examination and ventilation of the various

[159] Inspector's note: this is the Council's word, but it was not a steer as such: it was a set of questions as to whether the committee had considered the Illustrative Scheme and whether the condition referred to was, or was not, being put forward.

differences in the journey to that destination were not a good use of inquiry time and did not require adjudication.

9.11 The Council considers that Local Plan policies 55 and 56, which require among other things that the siting and massing of development should respond positively to and integrate with its context, are relevant to the amenity of neighbouring residents. Equally it considers Policy 60, which takes in the daylight and sunlight effects of tall buildings, is relevant. These policies are in conformity with paragraph 135(f) of the National Planning Policy Framework. The consideration of neighbouring residential amenity is a vital part of achieving well designed developments which integrate with and respond positively to their setting. Even a scheme which is well designed in its own terms must still respond appropriately to its context and not have unacceptable effects on neighbouring residents. The re-use of brownfield land does not give carte blanche to justify any level of harm.

9.12 The Council's planning witness accepted that the proposed limiting of the daylight, sunlight and overshadowing harm to that implied by the Illustrative Scheme, by way of the proposed condition, meant that his assessment of the overall harm dipped below the level of 'substantial' for the purposes of NPPF paragraph 125(c), supporting his conclusion that permission should, on the basis of that condition, be granted.

9.13 The Applicant has repeatedly sought to suggest that even without the condition, the functional worst-case scenario on neighbouring properties is represented not by the maximum parameter plans, but by the Illustrative Scheme. The Council does not accept that. While it may well be that a scheme like the Illustrative Scheme is likely to come forward, the Applicant seeks outline approval for the maximum parameters set out in the parameter plans.

9.14 The parameter plans could lead to greater impacts on residential amenity than the Illustrative Scheme. For example, while the parameter plans show a spatial arrangement that incorporates fixed minimum distances between new buildings, there are no comparable minimum distances between new buildings and neighbouring properties. Thus a scheme could come forward within the confines of parameter plan CD2.18 which could concentrate built development towards the outer edges of plots 8 and 9, next to sensitive residential boundaries, while increasing the space between buildings in the interior of the site. Likewise, built development on plot 10 could extend the full width of the northern edge of the envelope adjacent to Silverwood Close. Such an arrangement of buildings could maintain overall compliance with the plot coverage percentages and minimum interior building separation distances secured by the parameter plan, but it would lead to greater impacts on residential amenity than the Illustrative Scheme.

9.15 The Applicant's reliance upon the Design Codes in this regard is a red herring because the Design Codes do not secure the dimensions of the illustrative scheme or require development to come forward on a footprint which is any smaller than the maximum parameters secured by the parameter plans.

9.16 The Illustrative Scheme represents an overall 2.7% reduction in the footprint area for Plots 2–10 relative to the maximum plot coverage that would be permissible for each plot under the maximum parameters, when accounting for the

requirements of the Maximum Building Heights and Plots parameter plan.[160] The differences between the parameter plans and the Illustrative Scheme are clearly visible in Appendix A of the Applicant's masterplanning witness's proof.[161]

9.17 The Council therefore maintains that imposition of the condition is necessary. It is agreed its effects are less than those modelled for the parameter plans.

9.18 The BRE guidance is of general application and is not in any way limited to suburban or non-urban situations. If the reduction in VSC is greater than 20% and the residual VSC less than 27%, occupants of the building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear gloomier and electric lighting will be needed more of the time. If the reduction in daylight distribution is more than 20%, this will be noticeable to the occupants, and more of the room will appear poorly lit.[162]

9.19 The improved effects of the Illustrative Scheme are clear from the Applicant's Daylight Sunlight and Overshadowing proof of evidence.[163]

- Table 2 on p.32 shows that under the parameter plans, 9 properties on St Matthews Gardens were found not to experience any deviations from the BRE targets, whereas under the Illustrative Scheme that increased to 11;
- For 167 St Matthews Gardens, the retained VSC in the kitchen under the Illustrative Scheme increases from 19.8% to 24.2%, with the NSL impact reducing from 'major' to 'minor', a completely different proposition for the resident of that property – see Table 5 on p5. It is worth noting that under the parameters scheme this property would experience effects below even Mr. Lonergan's alternative targets for VSC,: 14.1% retained VSC in the 1st floor bedroom (down from 30.5% presently).
- For 177-201 St Matthew's Gardens, the NSL impacts change considerably: 3 major impacts become minor under the Illustrative Scheme, one reduces to moderate, and two moderate impacts become negligible (i.e. compliant) – see Table 8 on pp.37-38.
- The sunlight issues are removed altogether for 177 St Matthew's Gardens under the Illustrative Scheme: Table 17, p.59.
- For Silverwood Close, the number of properties suffering no effects beyond the BRE guidelines increases from 20 to 28 under the Illustrative Scheme (paragraph 12.1.7).

[160] CD2.18

[161] CD7.13A

[162] CD8.01, paragraphs 2.2.7, 2.2.11

[163] CD7.08

- The worst affected properties in Silverwood Close all experience a lessening of overall effects under the Illustrative Scheme: Tables 11-13 on pp.45-49.
- The effects on the properties in Sleaford Street are all materially reduced under the Illustrative Scheme: (paragraph 13.1.11).
- The effects on properties in Hampden Gardens are fully resolved under the Illustrative Scheme: proof at 13.1.24

9.20 The Council's position is that the difference between the parameter plans and the Illustrative Scheme amounts to a material and significant differential effect: a lessening of the harm. It is why the condition is necessary and is a game-changer for the planning balance.

9.21 There has been some discussion about alternative targets to those in the BRE Guidance. The danger about alternative targets is that the effects on real people can get lost. The residential streets near the site have a suburban character characterised by low rise properties with very good levels of existing daylight and sunlight. The Council's daylight and sunlight witness has pointed out that the majority of VSC values for St Matthew's Gardens and Silverwood Close are over 30% for ground floor rooms, while for daylight distribution, rooms typically have over 90% of the room area at working plane able to receive direct sky light. The Applicant's focus on, for example, inherently constrained VSC values for lower ground floor windows on St Matthew's Gardens, and certain other windows with inherent sensitivities, such as those on rear extensions to properties on York Street and Silverwood Close, obfuscates the generally well-lit character of most existing properties adjacent to the site.

9.22 The Applicant's daylight and sunlight witness suggests that retained VSC targets of 18% for living rooms and 16% for bedrooms would be appropriate, with scant justification for the choice of figures. Overall, the Applicant has failed to provide any compelling evidence to support the adoption of alternative targets below BRE guidelines. Even if alternative targets were adopted, the practical effects of the scheme remain the same. An alternative approach referred to by the Council's daylight and sunlight witness is the mirroring approach, the theoretical placement on the site of buildings which match the scale and massing of the surrounding properties – not as a potential alternative option but to provide a baseline for what fair and equitable daylight and sunlight levels might look like.[164] This shows that a contextual approach would suggest that 27% should be an appropriate target for retained VSC for most properties and 20% for 177-201 St Matthew's Gardens.

9.23 The BRE Guidance refers to alternative target values being appropriate in some cases where they are justified by special circumstances in respect of the development or its location. For example, "in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of

[164] CD7.01 p20-23

existing buildings". Those circumstances do not apply here, and there is no other justification for applying alternative targets. Overall the neighbouring properties enjoy very good levels of daylight and sunlight, and where constraints do exist, it becomes more important to maintain light. Moreover, the existing buildings on the Beehive site are relatively low rise; this is not a location with a prevalence of historic or high rise buildings which would require a different approach. The site is in a small city and the Applicant's examples of locations in Lambeth and Tower Hamlets are not comparable to the present circumstances.

9.24 The local comparators mentioned by the Applicant were not similar.[165] For example, at 137 and 143 Histon Road[166] and at the Grafton Centre[167] only a small minority of windows failed to meet the BRE guidance and at Pembroke College[168] the development was in the historic core.

9.25 The policy support found in paragraph 125(c) of the NPPF for the reuse of suitable brownfield land, and in paragraph 129 for planning decisions which make efficient use of land, are not an automatic justification for accepting a high quantum of harm where new development does not match scale of surrounding development (Rainbird at §97)[169]. As paragraph 006 of the NPPG on "Effective use of land"[170] explains, even when planning for higher density development it is still necessary to consider whether the proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers.

9.26 The fact that the site will inevitably be subject to densification and additional height in order to optimise its re-use, does not make these daylight, sunlight and overshadowing effects 'inevitable' – these effects are hugely sensitive to relatively modest setbacks as can be seen in the differences between the parameters and the Illustrative Scheme here. The site is deep and large, with a non-sensitive railway line to its eastern edge. It is only the 'edge conditions' to the residential neighbours which are really in play here.

9.27 To conclude on daylight and sunlight, the maximum parameters development would result in noticeable, significant, and unjustified reductions in daylight to habitable rooms, making them feel gloomier, darker, and more poorly lit, and in some cases, leaving gardens feeling less inviting and less enjoyable. These

[165] CD10.01 to CD10.20

[166] CD10.10

[167] CD10.11

[168] CD10.06

[169] CD7.01 p11, CD7.02 paragraphs 3.11-3.15

[170] CD9.43

losses would be evident and materially detrimental to the day-to-day living conditions of affected residents.

9.28 The Illustrative Scheme would be significantly less harmful. While some retained VSC and NSL figures would still fall below BRE target values and indeed below the contextual values identified by the Council's daylight and sunlight witness, and while a small number of properties would still experience major adverse effects, especially 36 Silverwood Close, the effects on most of the properties identified by the Council's witness as experiencing major adverse effects under the maximum parameters scheme would be materially reduced under the Illustrative Scheme. The residual effects of the Illustrative Scheme would no longer be unacceptable overall or justify withholding permission.

9.29 In respect of visual enclosure and outlook, the Council's planning witness considered there to be harm from the parameter plans to nos. 167 to 175 (odd), 185, 189, 191, 195, 197, 201, and 203 to 209 (odd) St Matthew's Gardens; nos. 34 to 45 (inclusive odd and even) and 49 to 58 Silverwood Close and 138 to 150 (even) Sleaford Street.[171] The outlook effects of the maximum parameters scheme on these properties would introduce an oppressive sense of visual enclosure to these neighbouring properties. This forms part of the overall harm to residential amenity which should carry substantial weight.

9.30 However, the proposed condition limiting the daylight, sunlight and overshadowing effects to those of the illustrative scheme would also have a positive effect on visual enclosure.

9.31 Indeed, while the condition would not secure the specific dimensions of the Illustrative Scheme per se, a sense of how it might serve to reduce visual enclosure impacts can be gained by looking at the images in Appendix A to the Applicant's masterplanning proof of evidence,[172] showing the modelled Illustrative Scheme dimensions with the dotted line of the maximum parameters scheme overlaid.

Council's case: other matters

9.32 It has always been accepted by the Council that the other harms identified as arising from the development, namely in terms of townscape and visual impact and heritage, were not sufficient to form the basis for a reason for refusal in their own right, although they need to be weighed in the planning balance.

9.33 There was some concern that these impacts had been assessed by the Applicant on the basis of the Illustrative Scheme rather than the maximum parameters. The condition on daylight, sunlight and overshadowing should go some way towards ensuring that the townscape, visual impact and heritage impacts of the scheme

[171] CD7.02 paragraph 4.83

[172] CD7.13A

would be close to those assessed in the Applicant's Environmental Statement Addendum.

9.34 On townscape and visual impact, there is a difference between the parties, with the Council concluding following a peer review[173] that there would be a low level of residual harm in townscape and visual impact terms, while the Applicant considers the effects of the scheme to be negligible or neutral with some receptors experiencing beneficial effects. Specifically, the Council's peer reviewer found moderate adverse effects on the setting of public rights of way on views from Coldham's Common and York Street because the scheme would be more overbearing than the current low rise structures which are largely surrounded by trees. The Council considers that this should have slight weight in the planning balance.

9.35 As regards heritage, it is agreed between the parties both that the application would cause less than substantial harm to a number of heritage assets by virtue of its impact on their settings, and that this harm would be outweighed by the public benefits of the scheme for the purposes of the heritage balancing exercise required by paragraph 212 of the NPPF. Topic Paper 2[174] provides an overview of the heritage assets in the immediate and wider context of the site. The Council's peer review[175] of the Heritage Impact Assessment identified less than substantial harm to four more heritage assets than those referred to by the Applicant – Kite Conservation Area, West Cambridge Conservation Area Custodian's House and Great St Mary's Church, and found slightly greater levels of harm than the Applicant to a range of heritage assets. Overall the peer review considered that there would be a moderate level of less than substantial harm, compared with the Applicant's view that it would be negligible. Heritage harm must be given considerable importance and weight in the planning balance.

Benefits

9.36 Most of the benefits claimed by the Applicant are uncontroversial. The Council's planning witness gave significant weight to benefits from boosting employment and the economy, great weight to the cluster effect of supporting additional lab and office space near other centres of innovation, moderate weight to a range of social benefits, substantial weight to the re-use of previously developed land, significant weight to the site's sustainable location and transport options and its sustainable design, and moderate weight to biodiversity net gain.[176] The Council has some reservations concerning how fully the benefits of the employment and skills strategy and scale-up space strategy would be realised in the operational

[173] CD7.04

[174] CD6.17

[175] CD7.04 Appendix 2

[176] CD7.02 paragraphs 5.9-5.50

phase as these are based on encouragement and the use of reasonable endeavours. Care should also be taken not to double count the benefits, which overlap, or to ignore counter-effects: for example in respect of increased business rates there would be a corresponding increase in the call on services.

9.37 It is also the case that data from Bidwells' own February 2025 Cambridge Offices and Labs Arc Market Databook[177] indicates that the situation in terms of office and lab space supply and demand in Cambridge has actually improved over the past year. This does not materially affect the Council's assessment of planning balance, but it is a factor to consider.

Planning balance

9.38 Paragraph 125(c) of the NPPF provides that substantial weight must be given to the re-use of previously developed land to meet an identified need, which applies here. There is also a range of other benefits as described above.

9.39 The Council takes the view that the daylight, sunlight and overshadowing and outlook effects of the parameter plans together with the other harms identified would amount to substantial harm which would justify the refusal of planning permission notwithstanding the identification of the benefits.

9.40 However, the securing of reduced impacts through the use of the daylight, sunlight and overshadowing condition would lessen the harm to residential living conditions and the planning balance shifts towards the grant of planning permission. Subject to that condition, the Council recommends that planning permission should be granted.

10. THE CASES FOR INTERESTED PARTIES APPEARING AT THE INQUIRY[178]

The case for Sarah Nicholas, on behalf of Cambridge Past, Present and Future[179]

10.1 The evidence about the need for the office space is questioned. The Greater Cambridge Growth Study states that the supply of office space is healthy.[180] In addition, large amounts of dry lab space have planning permission and are due to be delivered. There will be an oversupply for the period up to 2041 on the Council's own evidence. This kind of speculative development is likely to give rise

[177] CD9.40

[178] Interested persons appeared at the Inquiry on Day 1, before the Applicant and the Council had come to an agreed position on the proposed condition relating to daylight, sunlight and overshadowing.

[179] See IQ1.06 for a written version of Ms Nicholas's representation to the Inquiry

[180] CD9.20 paragraphs 8.8-8.26

to vacant plots and empty buildings. It will fuel the need for more greenfield housing and encourage in-commuting. An element of residential development should therefore be provided on the site. The site is well located for such development as part of a mixed use scheme.

10.2 The scale of the proposed development is inappropriate. From a distance the buildings will create the effect of a large, amalgamated block, especially in conjunction with the Grafton Centre. The scheme would be prominent from Castle Hill Mound, Redmeadow Hill, Lime Tree Hill and Lime Kiln Road. It would have a direct visual relationship with the historic city core, detracting from views of King's College Chapel and the University. It would appear overpowering when seen from Coldhams Common.

10.3 The scheme is therefore out of scale and there is no demonstrable need for it. Future development here should take place through a plan-led system

The case for Mr Ball on behalf of the Better Beehive Group[181]

10.4 The Group fully understands the need to accommodate Cambridge's growth and the wealth it generates. However, there could be a better outcome for the site, one that would provide greater benefits to the local population than that provided by the application scheme. If the scale of the scheme could be reduced, the proposal would be acceptable.

10.5 There is a disproportionate difference between the scale of the scheme and the surrounding housing. The scheme would create overshadowing and would be overbearing. For example, Plot 10 would case a large shadow over Silverwood Close, whilst Plot 6 would be very close to the Sleaford Street properties. The BRE guidance is not met. The assessment of the impact on residential amenity has not been adequate. The final design could be based on the maximum parameter scheme: it would be a mistake to grant outline planning permission that could give the Applicant the opportunity to build to the maximum.

10.6 The scheme would also harm the historic skyline and the panorama of the city. It would appear as a large cluster of boxy buildings seen adjacent to King's College Chapel and St Mary the Great. Together with the Grafton Centre it would appear too dominant.

10.7 The development would draw in more skilled workers and pull in more traffic. There are also concerns about its effect on water consumption. Future non-household growth will have to be water neutral. The scheme could also exacerbate the urban heat island effect, and although the best way to deal with

[181] See IQ1.10 for a written version of Mr Ball's statement to the Inquiry. See also IQ1.08, the Better Beehive Group's written representation to the Council dated 28 October 2024, and IQ1.09, the Better Beehive Group's supplementary comment to the Council of 13 January 2025. These latter two documents are referred to again in in the section below on written representations submitted to the Council.

this would be through planting large species trees, there would not be enough space in the scheme to provide them.

10.8 The site has not been identified in the current or emerging Local Plan as a potential site for office, information and communications technology or laboratory use. The proposals would establish a speculative, high-density employment site in a suburban and Conservation Area setting, isolated from any other research facility and with poor transport links

10.9 An alternative scheme should be brought forward that would have a greater mixture of uses, including housing, and its scale should fit in with its surroundings.

The case for Martin Lucas-Smith (resident living adjacent to the site)[182]

10.10 There is no love for the existing use and the quality of the development that is now on the site is poor.

10.11 However, the proposed scheme is too massive with dominant buildings facing into private bedrooms and bathrooms.

10.12 The scheme is also too biased towards providing large amounts of employment space when it should be balanced with housing. The creation of 6,000 jobs would give rise to a greater need for housing in a situation where there is already a shortage of housing.

10.13 The site seems an unlikely place for science-related development. It does not benefit from any cluster or agglomeration effect. It would be better to accommodate such development in a science park to the north of the city.

10.14 The loss of the local shops would be disadvantageous; they are heavily used. Care would need to be taken to move the shops to the Cambridge Retail Park given the level of demand for them. The loss of the swimming facility would be unfortunate because there is a shortage in the city. A gym with a swimming pool should be required by condition.

10.15 As regards the cycling and walking routes, much is good about the scheme, but the pedestrian/cycle path needs to be 4-5m wide because it is heavily used.

The case for Cllr Richard Robertson

10.16 The application is in outline, and too much is reserved for future consideration. The Design Code might not be enough to achieve the necessary design quality. A great many people walk or cycle through the streets south of the site and the scheme would be very noticeable. The flues would be too high, given the site's proximity to residential property. The scheme should have accommodated a swimming pool.

[182] See IQ1.05 for a written version of Mr Lucas-Smith's representation to the Inquiry

The case for Mark Rison (local resident)[183]

10.17 Coldhams Lane in Romsey and the adjacent network experience a lot of congestion and pollution and are hostile to active travel. The proposed development could therefore be beneficial in encouraging active travel, but it would depend on how it was implemented.

10.18 Residents in Coldhams Lane in Romsey would like to request management plans for the construction traffic route, with explicit restrictions on Coldhams Lane and a clear enforcement mechanism; and for the operational stage, which should explicitly prohibit the use of Coldhams Lane for delivery and servicing traffic. There should be stronger measures than "travel plans" to discourage the use of Coldhams Lane Romsey for car access to the site, and there needs to be a parking management plan which would only allow bona fide employees and blue badge holders on the site. There should be a guarantee of funding towards the introduction of controlled parking zones if needed.

The case for Nicholas Richardson (local resident)

10.19 The scheme would be unattractive when seen from Castle Mound.

10.20 The scheme would not do anything for the people of Cambridge. The existing shops are very useful. If they are removed, it will be necessary to drive to other retail parks and out of town shopping facilities, putting extra traffic on already over-subscribed roads.

10.21 The future of the site needs to be considered against a wider understanding and modelling of the city.

The case for Cllr Katie Porrer (a member of the Planning Committee that considered the application)[184]

10.22 The Planning Committee did not object to the change of use. There is a clear demand for science-based development in Cambridge and the benefits are recognised and welcomed.

10.23 The scheme that was considered by the Committee was the parameter plan scheme, not the Illustrative Scheme. The parameter plan scheme would have major adverse effects on neighbouring residential properties. As things stand, the development could proceed on the basis of the maximum parameters which would cause harm to many neighbouring properties. It would be possible to bring the scheme into line with the BRE Guidance, but not as presented. The proposal should therefore come back in a revised form.

[183] See IQ1.12 for a written version of Mr Rison's representation to the Inquiry

[184] See IQ1.11 for a written version of Cllr Porrer's representation to the Inquiry

The case for Cllr Naomi Bennett (Abbey Ward)

10.24 There is much to praise about the scheme and the way in which it has been brought forward in consultation with the Council. The roads in this area are congested, not everyone wants to use a bicycle, and bus journeys to Cambridge Station and Cambridge North Station can be very slow. The Applicant listened to the Council's concerns about traffic and a great deal of traffic and drainage modelling has been carried out.

10.25 There is also cautious optimism about the quality of the development and the spaces it would create. But there is concern about loss of daylight and privacy and a great many people have responded to the application proposals, including people for whom English is not their first language.

10.26 It is important to consider the distribution of growth and employment. Cambridge is an unequal city with pockets of local deprivation, unemployment, low levels of educational achievement, low incomes and poor health outcomes. Some major employers are relocating or shedding staff. People currently working in the Beehive Centre are worried about losing their jobs.

10.27 The scheme offers a lot of promises for a genuinely inclusive workspace. It is recognised that the Applicant has plans to encourage local access to jobs. Neurodiverse people are valuable in IT and research. The provision of entry level and intermediate level jobs in the scheme is important.

10.28 However, not all the jobs in the scheme will be taken by local residents. Many of the new employees will require housing, putting pressure not only on the need for new homes, but also on transport infrastructure and medical services. The scheme will also have effects on water and sewerage.

10.29 For these reasons, the scheme would bring both benefits and threats. High tech schemes like this should come forward as part of a bigger plan.

11. WRITTEN REPRESENTATIONS

In favour

Form the Future CIC:

11.1 The proposed redevelopment of the Beehive Centre into a state-of-the-art science park in central Cambridge is strongly supported. The project has the potential to provide transformational benefits for the city and its residents, particularly in addressing critical issues related to employment, inequality, and access to opportunity.

11.2 Cambridge is one of the most unequal cities in the UK, with a growing divide between wealth and opportunity. This project offers a unique chance to bridge that gap by creating sustainable, high-quality employment opportunities for residents across all levels of skill and experience. Through our ongoing work with young people in the community, we are acutely aware of the challenges many face in accessing stable and rewarding careers, especially in science,

technology, education and mathematics related industries. This science park has the potential to change that.

11.3 The science park will provide a wide range of job opportunities, from entry-level roles to highly specialised positions in science, technology, and innovation. Crucially, the project aligns with our mission to support young people with careers advice and employment preparation. By working with local schools, colleges, and other stakeholders, we aim to ensure that residents, especially those from underrepresented backgrounds, have clear pathways to careers in science, technology, education and mathematics and other growth sectors.

11.4 Through collaboration with the developers, we have secured a shared commitment to create a hub for learning and employment. This will include initiatives such as work experience and apprenticeships, mentoring programmes, skills workshops, and outreach events designed to connect local people with opportunities within the science park. This project is not just about building new facilities; it is about building futures.

11.5 We understand that many residents currently value the convenience of access to retail services at the shopping centre. For some, there may be concerns about how a science park would fit into their daily lives. We understand that retail services will not disappear but instead be relocated nearby, ensuring that shopping convenience is maintained.

11.6 Additionally, we believe that a well-planned science park can offer new amenities and benefits for residents. Modern science parks are no longer isolated corporate campuses; they are vibrant, multi-use spaces designed to serve both businesses and the surrounding community. Through public engagement, we will work with the developers to ensure that local residents feel connected to and can benefit from these new facilities, whether through learning opportunities, access to events, or the creation of shared spaces.

11.7 This project represents a significant opportunity to address Cambridge's growing inequality. By investing in skills development, offering accessible career pathways, and integrating community needs into the science park's design, we can begin to close the wealth gap and promote greater social mobility. Our organisation is fully committed to playing an active role in these efforts.

11.8 The redevelopment of the Beehive Centre is a vital step toward creating a more inclusive, prosperous, and equitable future for all residents of Cambridge.

Opposed

Farrer & Co on behalf of Porcelanosa:

11.9 The Porcelanosa building was constructed in 2002 and was designed by international award winning architects Benoy. Situated to the northwest of the site, it is a unique and imposing building with a distinctive architectural style. It is an exception to the norm of commonplace retail buildings. Glulam timber beams allow a curved form, and the roof, which follows the curve of the beams, is patinated copper.

11.10 The Porcelanosa building makes a significant contribution to its setting, and as such it complies with the relevant policies of the Local Plan, in that it is development that responds positively to its context (Policy 55) and creates a 'successful place' using design that is attractive and high quality (Policy 56). It also complies with Local Plan policies relating to sustainable development (Policy 1), carbon reduction and sustainable design (Policy 28) and designing high quality new buildings (Policy 57).

11.11 None of the existing planning policies refer to the Beehive Centre as an area for demolition and redevelopment. Granting planning permission would result in the demolition of a superbly constructed and relatively new, design focused and sustainable development. Demolition would be contrary to the objectives in Chapter 12 of the NPPF for achieving well-designed places. The Applicant and the Council have failed to take account of a material consideration, in failing to address the design concerns arising from the demolition of the building.

11.12 The Porcelanosa building is separated from the remainder of the Beehive Centre by the roundabout and is a distinct 'unit' in terms of architectural style, access (direct from the roundabout) and parking (which it does not share with other units in the Beehive Centre). It can thus be considered adjacent to the Beehive Centre, rather than a part of it. The retention of the Porcelanosa building would lead to a better planning outcome, in protecting an iconic building that has been recently constructed, sustainably designed, and makes a significant contribution to the built environment of the local area.

Individual written objections

11.13 The new buildings would loom over neighbouring streets and would block light from properties and gardens. At the scale and height proposed they would cause a significant loss of daylight and sunlight currently received into habitable rooms including dining room/kitchen, home office, conservatory, and bedrooms. Sky views from these would be lost. There would also be significant loss of sun from homes and gardens. Proper access to daylight and sunlight is vital to the mental and physical health of the community. The effects of the scheme could include stress, anxiety, and other health issues. Addressing these concerns requires thoughtful urban planning that considers the balance between development and the preservation of residential amenities to ensure the well-being of communities.

11.14 The office blocks are up to 35m tall (at least eight commercial storeys equivalent to at least ten residential storeys) with potential for an additional 10m for flues, and yet the surrounding area to the north and west is a neighbourhood of predominantly two and three storey homes, many covered by conservation area status. The purpose of the development is not appropriate in a quiet historic area. Its height and scale are disproportionate to the mostly two-storey residential budlings in the locality.

11.15 The Applicant has underplayed the severity of these issues. The visuals of the scheme and its relationship to the surrounding area are inadequate and it is unclear why the scheme has not been presented in a 3D model.

11.16 The scheme proposes a high density office and laboratory development, seen as being of national and European significance, in an inappropriate off-centre suburban location that is poorly served by public transport. It would employ over 6,000 people, yet it is remote from high quality regional scale public transport. It is simply the wrong location for this scale and intensity of development. A coherent growth structure is emerging in Cambridge around Cambridge station, Cambridge North station, Cambridge Science Park, the Biomedical Campus and Addenbrooke's Hospital, East West Rail and the expansion of Cambridge University into west Cambridge. The Beehive Centre scheme would be an unwelcome disruptor to this pattern, poorly located in relation to good quality public transport. Employment development of regional scale and significance should be located where there is frequent and convenient access by public transport from the wider region. The future of the site should be determined through the upcoming joint local plan.

11.17 For years, the Beehive Centre has acted as an important amenity for the local community, providing the goods and services that residents need to go about their day-to-day lives. People travel to the site from all across Cambridge, with many even coming from outside of the city to visit it. It is absolutely essential that key shops are kept. The Beehive is busy and well-loved for all its faults. The scheme would result in a lack of retail provision for local people.

11.18 The development would displace local businesses and cause significant local disruption. It would increase traffic and water supply problems and have an adverse effect on air quality. There are more suitable places for a development of this kind. There is already plenty of space for science and business to grow elsewhere in the city. While the development of the local economy and the Oxford-Cambridge corridor are supported, these larger goals should not be used to justify low quality planning that fails to strike an appropriate balance between broader development objectives and the welfare of the local community.

Representations made to the Council at the time it was considering the planning application[185]

11.19 At the time of the officer's report to committee, 367 representations in total from interested parties and individuals had been made over the three different rounds of public consultation.

11.20 No objections were raised (subject in certain instances to suggested conditions) by Anglian Water, Active Travel England, Cambridge City Airport, Cambridge Fire and Rescue Service, the County Archaeological Team, County Highways, the Designing Out Crime Officer (Cambridge Constabulary), the Environment Agency, the Health and Safety Executive, Historic England, the Lead Local Flood Authority, the MoD Infrastructure Safeguarding Team, and Natural England. Cam

[185] See CD3.01 Section 8, pp17-37

Valley Forum submitted a neutral representation, expressing the need to avoid water pollution and control surface water through the imposition of conditions.

11.21 Abbey People supported the application, citing positive community engagement, the reduction in the number of car journeys and the promotion of active travel, the retention of key retailers, the proposed skills partnerships, improved public realm, the large increase in jobs, increased biodiversity, substantial improvements in the built environment, improved transport and economic benefits.

11.22 Adams Hendry on behalf of the East West Railway Company made a representation to the Council on 12 January 2025[186] and a further representation dated 30 June 2025.[187]. These are considered later in this report in the section on conditions.

11.23 The Better Beehive Group submitted a extensive written representation to the Council, dated 28 October 2024, together with a supplementary representation dated 13 January 2025.[188] In summary, it stated that this is a speculative planning application for yet more high tech and research laboratory space which, by the Council's own evidence as set out in the Iceni report commissioned by Greater Cambridge Shared Planning, is not currently needed. Despite this being a revised scheme, the revised building blocks remain extremely substantial. The Group is particularly mindful of the effect of the combination of building height, mass, number of blocks, the unremitting boxy form and the closeness of the blocks to each other. The scale of development proposed is far too substantial for the surrounding area to accommodate comfortably. It would have an overwhelming effect on the Mill Road Conservation Area, and on neighbouring properties. This is demonstrated by the community visualisations in the Better Beehive representations.[189] The scheme would also have a harmful effect on Coldhams Common, the surrounding suburban area, the city skyline and important heritage assets. The scheme would set a precedent for other clusters of tall bulky developments in the vicinity. The site is currently poorly served by public transport connections. Concern is also expressed about the impacts on water scarcity, air quality, and the urban heat island effect. It would be far better that further developments of this type were brought forward as part of a plan-led approach.

11.24 Other objections were received from CamCycle, Cambridge Living Street, Cambridge Past, Present and Future, and Friends of St Matthew's Place, and from a number of individuals. Those who objected raised generally the same matters as the individual objectors at the Inquiry, which are set out above.

[186] CD11.11

[187] IQ1.16

[188] IQ1.08 and IQ1.09

[189] IQ1.08, Figures 1 and 2, p5 and IQ1.09 p2

12. CONDITIONS AND PLANNING OBLIGATION

Planning Conditions

12.1 In the event that the Secretary of State decides to grant planning permission, I recommend that the conditions set out in Annex D to this report should be attached to the permission.

12.2 With certain amendments, discussed below, these conditions broadly follow the final list of suggested conditions agreed between the Council and the Applicant dated 3 July 2025,[190] but I have re-ordered them, removed lengthy over-prescription and altered wording in the interests of clarity and in the light of guidance in paragraphs 56 and 57 of the NPPF and Planning Practice Guidance.

12.3 Conditions 1 and 2 control the framework for reserved matters applications. The scheme is in outline and given its size and the fact that it is a phased development, Condition 2 allows a period of 10 years for applications for reserved matters to be submitted. Condition 3 defines the approved drawings, which include the parameter plans and Design Code, Condition 4 the maximum floorspace and Condition 5 the phasing of the scheme. Conditions 1 to 5 are all necessary to control the parameters of the development.

12.4 Various conditions are necessary to protect the living conditions of neighbouring residents and the character of the area. These include Condition 6, which is the condition that was agreed by the parties on Day 2 of the Inquiry as a mechanism for limiting the daylight, sunlight and overshadowing effects of the scheme. It requires each reserved matters application to be accompanied by a daylight, sunlight and overshadowing report to establish the impacts on specific identified windows, rooms and gardens, and requires the daylight, sunlight and overshadowing effects to be no greater than those identified in the eb7 Appendices in respect of the Illustrative Scheme.

12.5 Other conditions necessary to protect the living conditions of neighbouring residents and the character of the area are Condition 7, which is a pre-commencement condition that establishes ground levels and floor levels; Condition 8, which requires the submission of a demolition and construction environmental management plan for each phase (which should include materials management, so the planning authority's separate condition on this subject is unnecessary); Condition 9, which limits the hours for demolition and construction and related deliveries; Conditions 10 and 11, which control noise generation; Condition 12, which is necessary to control light pollution; and Condition 13, which addresses fumes and odours from commercial premises.

[190] IQ1.17

12.6 Necessary controls over ground works and drainage are exercised by Condition 14, which seeks details of surface water drainage; Condition 15, which is designed to ensure that any site contamination is identified and appropriate remediation measures agreed in the interest of environmental and public safety in accordance with Local Plan policy 33; and Condition 16, which requires an archaeological investigation.

12.7 Conditions 17 to 20 address the need to submit details in respect of landscaping and biodiversity net gain.

12.8 Regarding sustainability, Conditions 21 and 22 require details to be submitted of energy and water use and rainwater and grey water management and re-cycling in the interests of reducing carbon dioxide emissions and addressing the serious water stress facing the area.

12.9 As regards necessary environmental controls, Condition 23 exercises control over back-up generators; and Condition 24 seeks details of on-site commercial waste storage, recycling and collection.

12.10 Vehicle management is important on this urban site and is addressed by Condition 25, which controls delivery, servicing and collection, Condition 26, which requires details of the management of car and bicycle parking for each phase and Condition 27 which requires facilities for electric vehicle charging.

12.11 Conditions 28 to 30 are necessary to safeguard external infrastructure operations and proposals. In respect of Cambridge Airport, Condition 28 requires the submission of a navigational aids impact assessment; Condition 29 requires a management plan to deal with potential bird hazards; and Condition 30 requires a glint and glare assessment.

12.12 Finally, Condition 31 concerns the need to safeguard land for East West Rail. Adams Hendry on behalf of the East West Railway Company made a representation to the Council on 12 January 2025[191] and suggested a draft condition as follows:

> "Prior to the submission of any reserved matters, details of any development of land within the East West Rail safeguarded area should be agreed in writing with East West Railway Company. The agreed reserved matters details should be submitted for approval by the local planning authority and the development should be implemented in accordance with the approved details."

12.13 East West Rail wrote further to the Council on 30 June 2025. It highlighted the potential for an interface between the applicant's proposed development, and the draft Order Limits for the East West Rail project.[192] It also stated that it may

[191] CD11.11

[192] IQ1.23

require access over the applicant's land in order to access railway land adjacent to the application site and wanted this put into a condition. This land is a triangle outside the safeguarding area behind Units 1 and 2.[193] East West Rail put forward draft wording (which had also been agreed with Network Rail) as follows:[194]

> "Vehicular and pedestrian access to Coldham's Lane road and cycle bridges over the Fen Line, via the Railway Bridges Access Zone (as shown on drawing number EWR/1708/RAZ/01/REVA), must be maintained at all times for the safe operation of the railway and the safe use of the bridges. Vehicular and pedestrian access to the Railway Working Area (as shown on drawing number EWR/1708/RAZ/01/REVA) via the land to the south of Coldham's Lane, must be maintained at all times to enable construction of East West Rail, the safe operation of the railway and the safe use of the Coldham's Lane cycle bridge. Condition XXX addresses safeguarded land for East West Rail."

12.14 At the Inquiry the Applicant objected to East West Rail's suggested condition, and the Council did not demur from the Applicant's position. The Applicant stated that the application scheme itself was designed not to impinge on the safeguarding area. East West Rail's suggested condition sought to secure access for a variety of purposes across the application site, which was not part of the safeguarding area, through to the Railway Working Area at the back, which was also not part of the safeguarding area. The Applicant considered that it was not appropriate for a condition to try to create a right to East West Rail to gain access across the Applicant's site to that land.

12.15 I consider that neither of East West Rail's suggested conditions are appropriate. The condition put forward on 12 January 2025 wrongly requires the Applicant to get agreement from a body other than the local planning authority in order to gain an approval under the planning acts. The condition put forward on 30 June 2025 wrongly attempts to use a planning condition to enable East West Rail to gain access across the Applicant's land. Planning conditions may require a developer to undertake actions which (among other things) are reasonable, relevant to planning and relevant to the development[195] but they are not a mechanism for addressing land ownership and access issues and the suggested condition is not relevant to planning or to the proposed development. In the Safeguarding Direction itself there is a requirement for exchange of information between the Secretary of State and East West Rail as part of a separate process.

12.16 Recommended Condition 31 therefore simply states that development within the East West Rail safeguarded area shall not prejudice the underlying objectives of

[193] This is shown hatched on Figure 1 of CD1.11 and in blue on the Railway Working Area Plan, IQ1.22.

[194] IQ1.16

[195] NPPF paragraph 55, PPG 21a-003-20190723

such safeguarding nor the safe operation of the railway nor the safe use by pedestrians and cyclists of the Coldhams Lane cycle bridge where it crosses the Fen Line railway. In my view this is sufficient to safeguard the interests of the East West Rail project whilst meeting the tests in the NPPF.

Agreement under s106

12.17 There is a completed s106 agreement dated 2 July 2025 between Cambridge City Council, Cambridgeshire County Council and Railway Pension Nominees Ltd[196] and a separate Community Infrastructure Levy Compliance Statement dated 30 June 2025.[197] The three signatories do not have a dissenting position on the contents of any part of the s106 agreement.

12.18 The s106 agreement contains the following schedules:

- Schedule 1 Employment & Skills Strategy
- Schedule 2 Community Outreach Strategy
- Schedule 3 Start-Up Space and Scale-Up Space Strategy
- Schedule 4 Community Floorspace
- Schedule 5 Public Realm & Public Realm Management Strategy
- Schedule 6 Meanwhile Use Strategy
- Schedule 7 Local Centre Strategy
- Schedule 8 Biodiversity Net Gain
- Schedule 9 Off-Site Leisure Contribution
- Schedule 10 Travel Plan, Transport Contributions & Monitoring
- Schedule 11 Public Art Strategy

12.19 Schedule 1 requires the owner to submit site wide employment and skills strategies for approval by the Council in order to secure relevant jobs during both the construction and operational phases of the development. The Council considers that this is supported by Local Plan Policies 2, 40 and 85 and the Draft Consultation Greater Cambridge Planning Obligations Supplementary Planning Document (Winter 2024) and would address the Council's planning objectives to strengthen and diversify job opportunities.

12.20 Schedule 2 requires the owner to provide a community outreach strategy which would aim to support a range of community and public programme events in

[196] CD7.25

[197] CD7.24

relation to the new public realm and community floorspace. It would build on the commitments to the local community which are identified in the Applicant's submitted Social Infrastructure Strategy.[198] The aim is to create a sustainable and inclusive development and the Council considers this to be an essential part of placemaking and in accordance with Local Plan policies 56 and 85.

12.21 Schedule 3 requires an start-up and scale-up strategy. The need for smaller lab and scale up spaces is identified in the Applicant's' market analysis.[199] The Council considers that this would be supported by Local Plan policies 2, 40 and 85.

12.22 Schedule 4 secures the provision of community floorspace in line with the Social Infrastructure Strategy which is seen by the parties and a key objective of good placemaking that would help to create sustainable and inclusive development.

12.23 Schedule 5 requires the delivery of "Hive Park", a new open space of about 7,000 square metres. This is a significant part of the total green infrastructure provision in the development and is an important part of the scheme's placemaking objectives. Schedule 5 also requires the owner to submit a public realm management strategy to the Council which would address future access, delivery, management and maintenance arrangements for the proposed public realm. The Council considers that this would accord with Local Plan policies 56, 59 and 85.

12.24 Schedule 6 requires the owner to submit a "meanwhile use strategy" which would identify how temporary uses could operate on the site during the construction phase in the interests of inclusion and sustainability. The Council considers this is supported by Local Plan policies 56, 59 and 85.

12.25 Schedule 7 requires the owner to submit a local centre strategy that identifies the location, size and mix of active ground floor (non lab or office) uses, and subsequently to submit a report on the centre's effectiveness. The aim is to ensure that an attractive and vibrant new local centre is created that meets the daily needs of onsite employees and local people, and complements other centres. The Council considers this to accord with Local Plan policies 40, 56, 73 and 85.

12.26 Schedule 8 requires the owner to make biodiversity net gain monitoring contributions to the Council for 30 years to enable the Council to recover the reasonable costs of monitoring and ensure the effective delivery and maintenance of on-site biodiversity.

12.27 Schedule 9 requires the owner to make a financial contribution towards the improvement of existing off-site leisure facilities at Abbey Sports Centre and Gym or Parkside Pools and Gym. This is considered necessary to address the loss of the existing on-site leisure facility. The Council considers that this approach is

[198] CD2.07

[199] CD2.28

supported by Local Plan policies 73 and 85. The parties to the s106 agreement do not consider that complete re-provision of the existing facility as sought by Policy 73 is justified given the proximity of other leisure facilities.

12.28 Schedule 10 contains a range of transport measures. These include financial contributions towards the delivery of new bus services. The Transport Assessment demonstrated that additional bus services would be necessary to ensure that its bus modal share targets could be achieved. The Applicant proposes a package of bus service improvements including those relating to Milton and Newmarket Park and Rides and bus services from St Neots, Huntingdon and St Ives to provide an additional 825 to 900 seats in the peak hour.

12.29 Schedule 10 also includes contributions to other facilities, notably to the Greater Cambridge cycle and pedestrian enhancement schemes of the Chisholm Trail, Eastern Access and Bottisham Greenway, and there are facilities for new bus stops where feasible (or alternative works) and a potential contribution towards a controlled parking zone. There would be a new crossing over Newmarket Road at its junction with Coldhams Lane. In addition, Schedule 10 requires the delivery of off-site improvement works in respect of the site accesses with Coldham's Lane Sleaford Street, York Street, St Matthew's Gardens, and the delivery of cycle routes with wayfaring signage. The requirements also cover the timing of detailed submissions and the phasing of delivery.

12.30 A monitor and manage scheme is required by Schedule 10 along with the establishment of a transport review group and a fund supported by contributions. This will enable modal split to be monitored and the fund will be allocated for mitigation schemes if the modal share targets are not met.

12.31 Schedule 10 also requires the submission and implementation of travel plan and an associated monitoring contribution in compliance with Local Plan Policies 5, 80, 81 and 85.

12.32 Schedule 11 requires the owner to submit a public art delivery plan for the identified public art zones together with a financial commitment toward delivering public art on-site and to manage and maintain such art, in order to create local distinctiveness and meet placemaking objectives. The Council consider that this approach is supported by Local Plan Policies 56, 59 and 85 as well as its Public Art Supplementary Planning Document.

12.33 There are also obligations on the City Council and the County Council in respect of the securing of monitoring fees.

12.34 In my view the contents of the s106 agreement are all necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

13. INSPECTOR'S CONCLUSIONS

This section takes each of the Secretary of State's identified matters in turn.

Matter a)

The extent to which the proposed development is consistent with Government policies for building a strong, competitive economy (NPPF Chapter 6)

13.1 Greater Cambridge is one of the UK's most vital economic assets. It is home to the largest life sciences cluster in Europe and contains world-class research institution and emerging sectors such as AI, genomics and semiconductor design. Life science and technology sectors are key priorities identified in the Government's 2024 Industrial Strategy. The Greater Cambridge economy generates over £50bn annually and represents Europe's fastest-growing technology sector. It is a net contributor to the Treasury of £1bn per annum and it also supports other enabling industries including manufacturing data storage and logistics. [7.5, 7.9, 8.44, 8.47-8.50]

13.2 There are challenges in the Cambridge region in achieving a balance between the needs of the life science and information and communications technology sectors and the availability of suitable deliverable sites. There is a significant level of demand for wet lab space and scale-up space that is not matched by current commitments, and the shortfall may remain until the end of the local plan period. Some have argued, with reference to the Iceni report, that there is less need for office and dry lab space. However, some of the theoretical supply may not be readily deliverable, only a small proportion is under construction and there is likely to be suppressed demand. Moreover, there is a trend in the life sciences sector towards demand for integrated place-based schemes such as the application proposal that encompass quality premises with amenities and public transport connectivity and a critical mass to create a community. The functionally interconnected nature of wet lab, dry lab and office space within these sectors suggests that it would not be helpful to place too much weight on the theoretical surplus supplies of the latter two which were identified by the Iceni report. As regards information and communications technology space, there is a focus on premium locations with good public transport, incubator and start up space and clustering. It is agreed between the main parties that high quality start-up space and scale-up space will remain in demand. [7.6-7.8, 8.26-8.36, 9.37, 10.1]

13.3 Against this background it is very important that adequate supply continues to meet the evolving requirements of the life sciences and information and communications technology sectors. The development would inject competition and provide new choices in the Cambridge market by adding an accessible, mixed-use research and development hub that aligns with the qualitative demand. This competition between locations keeps the market fluid, accelerates delivery and reduces the risk that foot-loose firms divert investment overseas. Accordingly, the quantitative targets including those in the Iceni analysis should be viewed not as caps but as reference points within a dynamic economy, where

a diversity of site, location and offer combinations is essential to satisfy demand and maximise job creation. [7.15, 8.27-8.41]

13.4 The scheme would represent a major investment in the city and the Cambridge region, providing a very large amount of additional employment floorspace on a brownfield site. Its mixture of offices, laboratories and local centre uses, and its range of floorplate sizes, would offer the flexibility to accommodate business and research tenants of all sizes, from start-ups and scale-ups to large global firms. The scheme would help to meet unmet need, would make a significant contribution to the Cambridge knowledge-based research and development cluster, and would reflect identified demand trends for the integrated place-based schemes described above. It would reinforce Cambridge's status as a globally significant innovation ecosystem, directly enhancing productivity through network effects and knowledge spillovers. It would secure investment and global talent that would otherwise be attracted to international competitors such as Boston and the Bay Area, fully supporting the government's ambition for growth in the Oxford–Cambridge innovation corridor. [4.2-4.3, 4.11-4.12, 8.5-8.6, 8.15, 8.40, 8.42]

The scheme would also provide greatly enhanced employment opportunities, creating an estimated 6,445 direct jobs comprising 905 entry level, 1,225 mid-skilled and 4,315 high skilled workers. This would be a very big increase over the Beehive Centre's existing 855 jobs (670 full time equivalent). The strategies for employment and skills, community outreach and start up and scale up, which are included in the s106 agreement, would also enhance local opportunities for employment and training. Overall, the development would deliver around 7,130 net additional jobs (6,480 full time equivalent) and would generate an estimated £660m annually in Gross Value Added compared with £60m from the Beehive Centre (£600m net). There would be significant additional returns in tax and business rates as well as an additional estimated £9.6m worker expenditure in the local economy. The scheme would also deliver significant social value. [7.10-7.15, 8.38-8.40, 8.43, 8.45, 8.147-8.148, 11.1-11.8, 12.18-12.22]

13.5 To conclude on this matter, the scheme would create enhanced provision for an internationally important cluster of knowledge and high technology industries. It would provide a flexible range of space including start up and scale up space in response to unmet needs and would address the qualitative trends for integrated well located accommodation. It would support economic growth in an area of high productivity and would provide a much higher level of employment including enhanced local employment and skills opportunities for local people. It would also deliver much improved social and community benefits. The proposed development would strongly support the objectives of Chapter 6 of the National Planning Policy Framework.

Matter b)

The extent to which the proposed development is consistent with Government policies for ensuring the vitality of town centres (NPPF Chapter 7)

13.6 The scheme would involve the removal of the Beehive Centre retail park, consisting of some 24,000 square metres of large format single storey retail space. The Local Plan does not include the Beehive Centre within the existing hierarchy of shopping centres and does not provide policy protection for it. [4.2, 7.20]

13.7 The retail park would be replaced by a local centre of a little over 5,000 square metres, which would provide convenience and comparison floorspace and restaurants and cafes for local people and workers in the new development. The Retail Planning Statement concluded that the scale of retail floorspace was appropriate and there was no evidence that local centres were vulnerable to impact from the scheme. Despite being criticized in a Council-commissioned review, the conclusions of the Retail Planning Statement are realistic given the specific purpose of the local centre and the large reduction in retail floorspace on the site. [4.4, 7.16 to 7.20]

13.8 Despite structural changes in retailing and purchasing patterns, the Beehive Centre remains a busy retail park containing a good range of large format retail premises including a foodstore. The concern expressed by some interested parties about the loss of retail and leisure facilities from the site is therefore understandable. However, there are many other retail outlets near the Beehive Centre including foodstores, large format retail premises and smaller town centre type shops. In addition, some of the Beehive Centre retailers are likely to be relocated in the nearby Cambridge Retail Park, which has spare capacity and is in the same ownership as the Beehive Centre. Also, since the local centre would serve a substantial working population, it is very likely that it would provide opportunities for small convenience shopping that would also be of value to local people. [2.6-2.8, 2.22, 2.24-2.26, 7.21-7.22, 11.17]

13.9 The scheme would not provide a like-for-like replacement for the swimming pool on the site. However, this is a private facility, and it is reasonable to expect demand to be addressed by the market. There are public pools in this part of Cambridge and the s106 agreement includes a financial contribution towards the improvement of Abbey Sports Centre and Gym or Parkside Pools and Gym. [7.23, 12.27]

13.10 Taking all the above into account, the scheme would not adversely affect the vitality or viability of any town centre. It would be consistent with Government policies in Chapter 7 of the NPPF for ensuring the vitality of town centres. A good range of retail and related facilities easily accessible to local people would still exist, so the scheme would not reduce the community's ability to meet its day-to-day needs as referred to in NPPF paragraph 98(c). [7.22]

Matter c):

The extent to which the proposed development is consistent with Government policies for achieving well-designed places (NPPF Chapter 12)

13.11 This is a wide ranging subject and I have divided it up into the sub-topics of urban design and transport, townscape and heritage and the impact on neighbours' living conditions. The last of these is addressed in greater detail because it is the topic on which the Council intended to refuse the development had it not been called in, and it remains a subject of concern with local residents.

Urban design and transport

13.12 The site currently contains low rise buildings and extensive areas of hard surface. It is dominated by motor vehicles. It has little sense of place or enclosure and no local distinctiveness. It does not represent a very efficient use of urban land. The scheme would bring about a great improvement in its character, appearance and intensity of use. It would achieve the NPPF objective of optimising the potential of the site to accommodate an appropriate amount and mix of development, and it would support local facilities and transport networks. [2.6, 2.8, 7.31-7.34, 8.19, 8.22, 8.55-8.61]

13.13 Land uses, access and circulation, landscape and open space and maximum building heights and plots would all be effectively controlled by the parameter plans and by the Design Code, the latter being a requirement of Condition 3. The parameter plans allow for some flexibility in the detailed design at the reserved matters stage. The Illustrative Scheme is intended to be one example of how a scheme could come forward in accordance with the parameter plans and Design Code. [4.6-4.13, 8.7-8.11, 12.3]

13.14 The parameter plans and the Illustrative Scheme are not alternative proposals. Within the terms of the application and its controlling conditions, it would not be possible to build out everywhere to the maximum envelopes shown on the parameter plans. That is partly because the parameters themselves would only allow a percentage of the maximum envelope to be built, and partly because the Design Code would exert additional influence over design and layout, including building separation and control over the interface with neighbouring development. This is particularly important to bear in mind later when considering the daylight and sunlight effects of the proposal. [8.9]

13.15 The parameter plans and the Design Code are comprehensive and embody the principles of good urban design, including active street frontages, natural surveillance, legibility and accessibility, the ratio of building heights to streets, the palette of materials and landscape design. The Design Code would ensure that the buildings would be of high quality. The scheme would contain a variety of attractive, useable and inclusive spaces, including genuine city spaces, which would be animated by the local centre, by the community space and by the entrances to the commercial buildings themselves. Despite the scale of the buildings, it would be a greener site, with more planted spaces, more trees and

greater biodiversity, and more efficient energy and water usage. A great deal of attention has been paid to all aspects of the internal urban design of the scheme. This aspect of the scheme is very much in line with the National Planning Policy Framework. [4.13, 4.22-4.28, 7.39-7.43, 7.46, 8.57-8.60, 8.64, 8.154, 12.23, 12.25-12.26]

13.16 Transport is included under this heading because it is an integral part of the urban design for the scheme. The development would remove the current car-dominated development in favour of a scheme that would promote sustainable and active travel. There would be a considerable drop in the amount of parking on the site, and the number of motor vehicle movements to and from the site. The development would be accessed from Coldhams Lane through a new pedestrian and cycle friendly junction which would provide a better public realm. There would be a number of pedestrian and cycle routes through an attractive sequence of spaces; this would assist in integrating the development with the movement pattern of its surroundings. Parking and vehicle access would be managed and there would be improved bus services, contributions to various off site cycle and pedestrian enhancement schemes, a potential contribution towards a controlled parking zone, and a new crossing over Newmarket Road at its junction with Coldhams Lane. [4.14-4.21, 7.33, 7.48-7.49, 8.58-8.59, 8.143-8.146, 12.10, 12.28-12.31]

Townscape and heritage

13.17 The part of Cambridge in which the development would be located has a varied character and is not wholly suburban. There are areas of low rise housing, but the area also contains some recent larger scale commercial, hotel and education-related buildings of 4, 5 and 6 storeys and these are located in close proximity to low rise development. The scale and form of development proposed in the application, and the contrast in scale with its surroundings, would not be harmful in this context. [2.9-2.23]

13.18 Viewed from the public right of way across Coldham's Common the development would be seen rising up behind lower suburban homes, presenting a more dominant built up appearance on the western side of the Common. However, the attractive nature of Coldham's Common itself would be little affected and overall the level of visual harm would be small. [8.65-8.66]

13.19 The scheme would not harm the townscape of wider Cambridge. The parameter plan and Design Code would ensure that the development was divided visually into separate parts, that the mass was broken up through varied elevational design and material tones, and that an interesting roof profile was created, thus reducing the scheme's perceived bulk. Flues would be controlled through the parameter plans and Design Code so as to create architecturally complementary features in appropriate places within the roofscape. Elevated views of the development within the townscape would be relatively few. The scheme would break the skyline when seen from Castle Hill Mound, but not dramatically so, and there are other developments existing and proposed on the edge of Cambridge that do so. The overall impact on that viewpoint would be small. This is readily apparent from the technical visualisations in CD2.44, notably those from Castle

Hill Mound, and I verified this through my own site visits. The scheme would be seen at some considerable distance from Redmeadow Hill and Lime Kiln Road but from there the perceived impact on the townscape would be negligible. The scheme would be assimilated successfully into the wider townscape. [4.30-4.32, 8.65-8.71]

13.20 As regards heritage, the nearest heritage asset is the Mill Road Conservation Area. It partly adjoins the application site, but it is a well-defined area which derives its character from its history, its own densely-built fine-grained urban terraced typology and its mix of uses. It is very distinct from the site in character and appearance. There would be private views of the proposed development from the rear windows and gardens of the houses in York Street, which is in the conservation area, but from public viewpoints there is little intervisibility between the application site and the conservation area, apart from a limited view at the corner of York Street and Ainsworth Street. The new buildings would not overtop the roofs of the existing housing when seen from the streets themselves. [7.42, 8.73-8.75]

13.21 There would be a small degree of harm to the conservation area's significance arising from the proximity of the proposed development and the change of scale, but this would be at the lower end of less than substantial. The parameter plans and the Design Code would ensure that the proposed development would be a much better piece of urban design, and the scheme would have a greatly improved public realm, in comparison with the present condition of the site, which has a small scale adverse effect on the conservation area owing to its utilitarian buildings and large expanses of tarmac. [8.75]

13.22 In addition to Mill Lane Conservation Area, the Applicant's Heritage Assessment identified less than significant harm to five other heritage assets: Christ Church in Newmarket Road, Jesus College Chapel, All Saints Church in Jesus Lane, Castle and Victoria Road Conservation Area, and the Central Cambridge Conservation Area. However, the site itself is not especially physically close to any of these assets. Moreover, there are not very many places from which the application scheme and the heritage assets can be seen in the same view, the most notable viewpoint being Castle Hill Mound. There are also views from, the top of St Mary the Great Church tower, and, at a much greater distance, from Redmeadow Hill and Lime Kiln Road. [7.35-7.38, 8.76-8.80]

13.23 From Castle Hill Mound, Christ Church and Jesus College Chapel would appear in the same general direction as the application site, and the nearest significant skyline-breaking feature, All Saints Church, would be seen to the right. Most of the historic core of central Cambridge is in a different direction, well off to the right. The development would slightly change the distant townscape and skyline in the wider panorama within which these assets sit. The views from Lime Kiln Road and Redmeadow Hill are too distant to be able to discern a genuine impact on heritage assets from the application scheme.

13.24 The Heritage Assessment and the Applicant's expert heritage witness concluded that that there would have a "negligible adverse" effect on the six assets identified by the Applicant. The Council assessed the impact to be greater, though still less

than substantial, and identified further affected heritage assets. It is unlikely in my view that the minor changes described above would really represent harm to the significance of any of these assets. The effect of the proposal, such as it is, would be more akin to a minor townscape impact. Just because a development would be visible in a view that also contains heritage assets, it does not mean that it would harmful either to the significance of any of those heritage assets. If there were considered to be harm, in my view it would be at the very lowest level of "less than significant". [7.35-7.38, 8.76-8.80]

13.25 The Porcelanosa building is an interesting modern structure, but it is not listed or included on any list of non-designated heritage assets. The removal of this attractive design would be something of a loss. Nevertheless, it is still a single storey large format car-based outlet within a retail park. Its contribution to its setting, which consists of a car park, road accesses and the backs of neighbouring homes, is very limited. The application scheme demonstrates that there are more efficient ways of making the best use of the land. [2.6, 8.81, 11.9-11.12]

13.26 The level of harm to the Mill Lane Conservation Area (at the lower end of less than substantial) the minor changes to the context of other heritage assets (which I do not consider harmful, but which the Inquiry witnesses have judged to amount to less than substantial harm), and the loss of the Porcelanosa building, would in my assessment be heavily outweighed by the benefits of the scheme.

The impact on neighbours' living conditions

13.27 Good design creates better places to live and helps make development acceptable to communities. It promotes well-being with a high standard of amenity for existing as well as future users. Developments should be sympathetic to the surrounding built environment, whilst not preventing or discouraging increased densities.

13.28 In this case, the immediate surroundings are sensitive. The proposed development would be close to the mostly 2 and 3 storey homes of St Matthew's Terrace, Silverwood Close, York Road and Sleaford Street. Despite the Applicant's extensive community engagement and the amendment of the scheme, there continues to be concern in the community about the scale and massing of the proposal and its effect on neighbouring living conditions. [2.10-2.18, 9.2-9.15, 9.21-9.29, 10.2, 10.5, 10.11, 10.23, 11.13-11.16, 11.23-11.24]

13.29 The relevant factors to consider are the siting and massing of the proposed development and its effect on the outlook from and overlooking of people's homes; daylight and sunlight to people's homes; and overshadowing of gardens. The following analysis brings these factors together and considers the impact of potential buildings on neighbouring homes where the relationship is the most significant – it is recognised that some other homes would undergo smaller daylight, sunlight and overshadowing impacts but they are not included in the analysis in the interests of brevity. It is worth reiterating the point previously made that the buildings could not be built out everywhere to the maximum envelopes shown on the parameter plans and that the parameter plans and the Illustrative Scheme are not alternatives; the Illustrative Scheme is indicative of how a

scheme might come forward in compliance with the controls exerted by the parameter plans and Design Code. [8.9, 13.14]

13.30 References for this analysis include Appendix A to the Applicant's Masterplanning proof of evidence (CD7.13), together with the parameter plans and the material in the Design Code (CD2.64b).[200] As regards daylight and sunlight, the key material is in CD7.08 and CD7.09, the Applicant's Daylight and Sunlight proof of evidence and appendices, together with CD2.31, the Daylight and Sunlight Report, and CD2.63a and CD2.63b, the Daylight and Sunlight Report Addendum. References to VSC and NSL within the BRE Guidelines are explained earlier in this report. [8.84-8.91] See also the description of the neighbouring houses [2.9-2.19], the summary of the Applicant's assessment [8.96-8.128] and the Council's comments. [9.26 to 9.31]

34-39 Silverwood Close

13.31 Plot 10, the multi storey car park, would be sited to the rear of these houses. It would be 8 storeys and just over 25 metres high. The cross section on p24 of CD7.13 shows it to be some 32 metres from the main rear wall of 36 Silverwood Close, but the house also has a rear extension. Given the scale of the proposed building, that is a close relationship. The angled orientation of the building on Plot 10 would limit its perceived bulk to a degree and allow daylight to enter around the sides of the building, but it would still present a large face towards the backs of these houses. Some, but not all, of the gardens in Silverwood Close have substantial trees, and there would also be an additional planting belt between the building and the rear of the gardens, which would help to mitigate (to a degree) its impact. The visual effect can be appreciated from the representations on pp25-26 of CD7.13.

13.32 There would be no difference in height between the maximum parameter plan and the Illustrative Scheme, but the latter would have a smaller plan from than that shown on the parameter plans, with a somewhat narrower elevation directly facing Silverwood Close which would assist a little in mitigating the visual impact and improving daylighting conditions.

13.33 As regards daylight, the biggest impacts from the maximum parameter plans would be on 36 Silverwood Close, where there would be major VSC and NSL impacts on a ground floor dining room and major NSL impacts on a kitchen and bedroom. There would also be major NSL impacts on first floor bedrooms in 34, 35 and 37 Silverwood Close and the scheme would have moderate impacts on other windows and rooms in this row of houses. Under the Illustrative Scheme the impacts would be mostly moderate or minor, with a major NSL impact confined to a ground floor kitchen in no 36, and in each case there would be better retained VSC levels, particularly to main living rooms.

[200] The Illustrative Scheme building outlines are shown as firm lines; those that could theoretically be built under the maximum parameter plans are shown as dotted lines.

13.34 There is no doubt that even under the Illustrative Scheme the building on Plot 10 would have a considerable visual impact when seen from the rear of the nearest houses in Silverwood Close and from their rear gardens. The change would be very noticeable to residents compared with the current open aspect across the car park, and some rooms would have reduced daylight. However, the juxtaposition of scales, the visual impacts and the levels of daylight and sunlight under the Illustrative Scheme would not be especially unusual in a more densely built up urban area.

40-45 Silverwood Close

13.35 The closest building would be on Plot 3. CD7.13 pp 8-9 illustrates a 4 storey building on Plot 3 with a height of about 20.8m. At its nearest it would be about 41m from the back of properties in Silverwood Close under the parameter plans and around 44m under the illustrative scheme. These separation distances would be adequate to prevent overlooking and there would be a substantial intervening area of tree planting which would mitigate the impact. The Illustrative Scheme would present a notably less bulky outline to homes and gardens than the maximum parameter plans.

13.36 Under the parameter plans most windows would meet BRE guidelines for both VSC and NSL. A few windows would not meet BRE guidelines but the breaches would mostly be negligible or minor. Under the Illustrative Scheme all except one window would meet the BRE Guidelines for VSC. The one window would be a ground floor kitchen diner to No 40 but the impact would be negligible. The NSL criteria would be met in every case. Both the maximum parameter scheme and the Illustrative Scheme would meet the BRE Guidelines for sunlight and there would be almost no loss of sunlight to gardens.

49-50 and 51 Silverwood Close

13.37 The closest part of the scheme would be Plot 1. CD7.13 p 5 illustrates a 3 storey building on Plot 1 with the upper floors set back. The Illustrative Scheme would place a low element of one commercial storey, 5.57 metres high, nearest to the rear of the houses in Silverwood Close. In the maximum parameter plans this element is shown as 2 commercial storeys and 10.61 metres. The back to back distances of 18.5m to 23.5m for a two storey building would not be unusual in an urban area, and privacy within the dwellings would not be harmed. However, the 2 storey form in the parameter plans would be close to the rear boundary and would be likely to appear very noticeable from the nearest gardens. It could potentially have an effect on privacy; although the Design Code is intended to operate to mitigate loss of privacy through appropriate building design. The third storey of the building would rise to nearly 16 metres and would be clearly visible from the rear of the properties and their gardens. It would be 25m to 30m away from the backs of the nearest houses, which would help to reduce its impact to a degree, but the indicative view in CD7.13 demonstrates that the maximum outline would be bulky. However, the Illustrative Scheme would present a less bulky profile.

13.38 The VSC and NSL effects of both the parameter plans and the Illustrative Scheme would affect the ground floor dining room at no 49-50 Silverwood Close

which would undergo a major reduction in VSC such that the BRE target would not be met. However this is an internal dining room window that borrows light from an extension and this exaggerates the apparent impact. The parameter plans would also fail to meet BRE NSL guidelines to a ground floor dining room window and a first floor bedroom window in 51 Silverwood Close. However, under the Illustrative scheme these impacts would be moderate or minor. As regards sunlight impact on dwellings or gardens, there would either be no impact or negligible impact.

72-74 Silverwood Close

13.39 As regards sunlight to gardens, the maximum parameter plans would result in larger areas receiving less than two hours of sun on March 21st, with particular impacts on 72 to 74 Silverwood Close.[201] The Illustrative Scheme however shows a reduced impact.

St Matthew's Gardens

13.40 Plot 8 would be located to the south of St Matthew's Gardens. It would be a 6 storey building with the three upper floors set back. The nearest part of the building to the backs of houses in St Matthew's Gardens would be about 15m high and, in the parameter plans, about 23m from the main rear wall of the 4 storey block of St Matthew's Gardens, although the part projection of St Matthew's Gardens reduces these distances. The set back upper three floors of the proposed building would be nearly 34m away from the main rear wall of St Matthew's Gardens in the parameter plans.[202] The building on adjacent Plot 9 would be further from St Matthew's Gardens, at 33.5m to the 3 storey element and 45.5m to the 6 storey part.

13.41 In respect of daylight, the maximum parameter plan would have major VSC impacts on a ground floor bedroom in 163 St Matthew's Gardens, a first floor bedroom in 165, a ground floor kitchen and first floor bedroom in 167, a ground floor living room and first floor bedroom in 169, ground living rooms in 171, 173 and 175, and two bedrooms in 177-201. On the NSL measure there would also be several major impacts. There would also be a range of moderate and minor effects to various other rooms. In two cases where there would be major impacts the retained VSC would be less than 15%. There would be a major sunlight impact to one lower ground living room.

13.42 There would be greater separation in the Illustrative Scheme, the comparable distances being 26m to the lower part of Plot 9 and nearly 37m to the higher part. In consequence the Illustrative Scheme shows a reduced impact. There would still be major VSC impacts on one room in 163 St Matthew's Gardens and two

[201] CD7.09 Appendix 5

[202] Please note these dimensions have been accidentally transposed in the cross sections on p20 of CD7.13

rooms in no 167, but the retained levels of VSC would be much higher. The scheme would not meet the BRE Guidelines in respect of a number of other windows and rooms in St Matthew's Gardens, but without major levels of impact. Impacts would be reduced to moderate or minor. Sunlight impacts would be negligible or would not occur.

13.43 Plots 8 and 9 would create a more urban scale for the residents in this part of St Matthew's Gardens. The buildings would appear much larger than at present. The new buildings would appear very substantial from many of the rear windows and spaces of St Matthew's Gardens even under the Illustrative Scheme, but in my assessment the separation distances in that scheme, together with the substantial existing boundary planting, and the operation of the Design Code, would prevent the buildings from being unduly overbearing and would avoid undue loss of privacy

13.44 The daylight, sunlight and overshadowing impacts need to be considered against the background that this part of St Matthew's Gardens has been built very close to the boundary with the Beehive site, with buildings of up to 4 storeys, taking advantage of the current openness of the Beehive site. This results in high existing VSC levels, and proportionately greater falls in those levels from the development. The openness of outlook and levels of daylight borrowed from the Beehive site cannot be assured within a city where it is important to make the best use of open land. It is reasonable to expect the Beehive site to be used more intensively, with consequent impacts on St Matthew's Gardens. It should also be noted that the actual impacts in some instances would be likely to be less than suggested by these figures because the substantial tree and hedge planting along the boundary, which would be retained, already has an impact on daylight and sunlight in the existing condition. Taking all the above into account, the overall impacts from the development, as represented by the Illustrative Scheme, would be acceptable.

Sleaford Street

13.45 Plot 6 would be a 5 storey building but its upper floors would be set back so that the nearest element to 150 Sleaford Street would be of 2 storeys. In the Illustrative Scheme, this 2 storey element would be 11.16 metres tall, and 6m from the flank wall of No 150, but the perceived height from Sleaford Street would be around 9m because the ground level within the application site is lower than that of Sleaford Street. The third floor would be about 9m from the boundary and 12m from the flank wall, and the fourth and fifth floors/flue zone would be set back from the flank wall about 29m and 37m respectively. The visual impact of the scheme would be greater when seen from the garden than from the dwelling itself but the nearest part facing the garden would have a relatively low profile. Part of the flue zone would be seen, but at some distance. The substantial upper floor setbacks would help to limit the overall bulk of the scheme and it is apparent from CD7.13 p 14 that the Illustrative Scheme would be less bulky and visually dominant than that theoretically permissible under the maximum parameter plan.

13.46 The analysis in CD2.31 demonstrates that under the maximum parameter plans the BRE Guidelines would be breached in the case of a ground floor bedroom in

148 Sleaford Street. The VSC would drop to around 17%; this would improve to 24% under the Illustrative Scheme. These properties would continue to receive adequate sunlight to rooms and gardens. The Illustrative Scheme would be within the bounds of normal urban conditions.

York Street

13.47 Plots 7 and 8 would present three storey elevations towards the rear of some of the houses in York Street, with a further three floors set back. The three storey elements of Plots 7 and 8 would be about 15m high, but being at a lower ground level their perceived height from York Street would be less than 13m. They would be 32m to 33m (parameter plans) and 33m to 34m (Illustrative Scheme) from the nearest York Street houses, which is sufficient to avoid overlooking and excessive bulk. There would also be good separation between the proposed buildings and the ends of the York Street gardens, and the scheme would increase the already substantial planting in this area. The upper floors of Plot 7 would be some 64m (parameter plans) or 65m (Illustrative Scheme) from the backs of the houses. The equivalent distances for Plot 8 would be about 55m and 56m. Again, this is a good level of separation. The buildings in both the parameter plans and the Illustrative Scheme would be acceptable in terms of privacy, outlook and perceived bulk.

13.48 In respect of NSL there would be several breaches of the BRE Guidelines. The most significant of these would be major breaches in respect of ground floor habitable room windows at 52, 56, and 76 York Street and a first floor window at 74; there would also be a number of moderate or minor breaches. The Illustrative scheme would reduce the impact; the only remaining major breach would be to the first floor window of No 74 which is thought to be a non-habitable room. The breaches in NSL are spaces where the design of neighbouring properties and the insets between neighbouring extensions increases sensitivity due to the depth of the rooms. Neither the parameter plans nor the Illustrative Scheme would cause a significant breach of the BRE guidelines in respect to VSC.

13.49 As regards sunlight, the guidelines would not be significantly breached except for in the case of a ground floor window at 72 York Street where there would be a major breach of the guidelines in the parameter plan. Under the Illustrative Scheme, the impact would be negligible.

13.50 Overall, the Illustrative Scheme would represent a satisfactory arrangement.

Other properties

13.51 I do not consider the relationship of the scheme to other properties to be sensitive. That includes the homes on the other side of the railway line. For the residents in those homes who do have a direct line of vision towards the Beehive Centre, the proposed buildings would appear considerably larger than at present, but the distance is such as to avoid major harmful impacts in respect of loss of daylight, sunlight, overshadowing or outlook. [2.19 and CD7.13 pp 7, 10-12, 15]

Conclusion on Matter c): The extent to which the proposed development is consistent with Government policies for achieving well-designed places

13.52 The site currently has little sense of place or enclosure and no local distinctiveness and it is dominated by motor vehicles. The scheme would bring about a great improvement in the character and appearance of the site. It would embody the qualities of good urban design, create a distinctive place, contain well-designed spaces with animated streets and active street frontages. It would be pedestrian and cyclist friendly and would support public transport. It would make the best use of this urban brownfield site.

13.53 The scheme would have a very modest wider impact. It would break the skyline slightly when seen from Castle Mound but there are already some developments that do the same. It would not appear obtrusive in views from Castle Mound or other vantage points such as Redmeadow Hill. The scheme would cause less than significant harm at a low level to the Mill Lane Conservation Area, and in the view of the Applicant's heritage witness to five other assets, though I have concluded that there would be no harm to the significance of these assets or to the additional assets identified by the Council. Were such harm to exist, it would in my view be at the negligible level of less than substantial. All heritage impacts in this case would be greatly outweighed by the scheme's public benefits.

13.54 The Illustrative Scheme in my view demonstrates that the parameter plans and Design Code can work together to produce a successful scheme that would be acceptable in its impacts on neighbouring homes in respect of daylight, sunlight, overshadowing and outlook. The BRE Guidelines would still be breached in a number of instances but some of the reductions in VSC arise from the fact that much of the site is currently very open and that conditions will of necessity change to make the best use of this urban brownfield site. Moreover, some of the low VSC and NSL values arise because of particular circumstances such as overhanging eaves and rear extensions. The Illustrative Scheme demonstrates in my view that the scale and number of impacts would be adequately mitigated through the parameters and Design Codes.

13.55 It is true that if it were possible to build the scheme to the maximum building envelopes shown on the parameter plans, a substantial number of windows and habitable rooms would fail against the BRE Guidance, with many examples of major reductions in daylight and low retained VSC values.[203] But the maximum envelopes shown on the parameters plans do not represent the fixed building lines of an actual scheme: it is not possible to build out everywhere to the maximum building envelopes owing to the controls exerted by the parameter plans themselves and by the Design Code.

13.56 The Illustrative Scheme demonstrates that an acceptable development can be built within the terms of the outline planning application. In such circumstances it

[203] Caution should be exercised over the idea that a retained VSC of 16% to 18%, which has been referred to in some appeal decisions, is a generally acceptable alternative benchmark. Although those figures might have been considered appropriate in the circumstances of those cases, they are not rooted in the research that lies behind the BRE Guidance and of course each case must be considered on its merits.

is not normally appropriate in my experience to refuse an application on the basis that a less acceptable scenario might be built, provided adequate controls exist to prevent this from happening. The local planning authority has full control over the final outcome through the reserved matters approval process. The appropriate response is to attach conditions to the planning permission to ensure that the development is acceptable.

13.57 That leads to the question of whether Condition 6 is necessary. I believe it is, because it would provide a degree of certainty for those who are concerned about the potential impact of the eventual scheme. It seeks to confine the daylight, sunlight and overshadowing impacts of the proposed development to no greater than those set out in the eb9 Appendices. Those impacts have been tested; they are a known quantity and in my assessment they are acceptable. The condition does not confine the development to the Illustrative Scheme itself, so it still provides flexibility for the developer.

13.58 There is no doubt that even under the illustrative Scheme residents whose homes back closely on to the site would experience a substantial adjustment (in their rear aspect, not their whole dwellings) in daylight levels, scale and outlook. The environment at the rear of their homes would change from suburban to a denser urban environment with much larger scale buildings than those in the current Beehive Centre, and the levels of daylight would change accordingly. The scale of the buildings and the building-to-building relationships would be those of a more central urban area. On the other hand, the scheme would make much better and more intensive use of an urban site and overall, as a neighbour, it would be a much better designed development than the current Beehive Centre.

Matter d) The extent to which the proposed development is consistent with the development plan for the area

13.59 Economic and employment issues have been considered under Matter a). Local Plan Policy 2 sets out the spatial strategy for the location of employment development. The site is not specifically identified as a development site in the Local Plan. It is not included in the Proposals Schedule at Appendix B and is not one of the six key locations for the delivery of employment land to support the Cambridge Cluster referred to in the supporting text to Policy 2. It is identified as an Opportunity Area in the emerging Local Plan, but work on this plan is at an early stage and its policies and proposals do not carry much weight.

13.60 Several representations have criticised the scheme as being in the wrong place: out of alignment with the key identified employment locations and the strategic pattern of development in Greater Cambridge, not especially close to the stations, out of scale with the area and, in the absence of a residential element, not reflective of the mixture of surrounding uses or the housing needs of the city. Some have argued that, given the sheer size of the scheme, the scale and composition of any development on the site ought to be considered as part of the plan-led process in the wider context of the future development needs of Cambridge.

13.61 It is certainly the case that the site is not adjacent to the stations and would contain far more floorspace than currently exists on the site. On the other hand,

adopted Policy 2 does not seek to confine employment development to the identified sites. The strategy is to support Cambridge's economy with particular emphasis on growth of the Cambridge Cluster of knowledge-based industries and institutions. This allows for beneficial windfall developments to take place on sites that that were not anticipated for development at the time the plan was produced.

13.62 The scheme would support important economic strategic objectives in the adopted Local Plan: it would promote economic growth in a sustainable and accessible location and facilitate innovation and research and knowledge based industry. It would meet identified need for laboratory floorspace and support the Cambridge Cluster. At the same time it would respond positively to Cambridge's key constraints: it would be outside the historic core, make efficient use of land, reduce the pressure on the local highway network and reduce pressure on the Green Belt by providing additional employment floorspace within the urban area.

13.63 Thus in my view the scheme would not conflict with the Local Plan in respect of the location of large scale employment development. It would accord with Policy 2 and also Policy 40 of the Local Plan which focus employment development on the urban area and the city centre, and support employment proposals in sustainable locations and new business space in areas where there is strong demand.

13.64 Local Plan Policy 3, which sets out the spatial strategy for residential development, makes provision for housing elsewhere in Cambridge. There is nothing in the plan that would actually require residential development to be included on the site and the scheme would not conflict with Policy 3 in respect of the spatial strategy for housing. Given the lead-in time for this very large scheme, any consequences it might have for future housing need in and around Cambridge can be dealt with through the emerging plan.

13.65 Retail impact and the effect of the development have been considered under Matter b). The scheme would not harm any town centre. The retail park does not enjoy policy protection and, although large format retailing would be lost, there would be adequate retail provision both in the surrounding area and indeed in the form of the new local centre created on the site. The scheme would therefore be in accordance with Local Plan Policy 6.

13.66 The loss of the swimming pool and gym from the site, also discussed under Matter b), would to a degree conflict with Local Plan Policy 73. This policy resists the loss of community, sports and leisure facilities unless the facility can be replaced on site or appropriately relocated. The degree of conflict with the policy would not be very significant for the reasons discussed under Matter b) and the development would offer a contribution towards upgrading existing public facilities.

13.67 Whether the development would respond positively to its context, create a successful place, deliver good building design and create a well-designed public realm, as sought by Local Plan Policies 55, 56 57 and 59, have been explored under Matter c). The development would clearly be of a different scale and grain from its surroundings, and it would be different too in its format and its proposed uses. Some neighbouring dwellings would experience a substantially altered

outlook, and some a loss of light such that the BRE Guidelines would be breached, even in the Illustrative Scheme.

13.68 However, the existing site is a low rise large floorplate retail park with an abundance of surface level parking, so it is already very different from its surroundings. It is well-defined and discrete, and it is reasonable to expect development of a larger scale here in order to make the best use of an accessible urban brownfield site. This will inevitably result in a change in scale and outlook and a degree of impact on neighbouring properties. The loss of light to some rooms should be seen in the context that many properties have high existing levels of daylight for an urban area owing to their open aspect over the retail park and its car park. There are other examples of recent development in the general area of large scale development that contrasts with lower scale surroundings.

13.69 Whilst making the best use of the site, the scheme demonstrates a positive response to its context in the siting and orientation of the buildings, the use of set-back upper floors, the controls exerted by the maximum parameters, the comprehensive Design Code, the emphasis on sustainable transport and the good pedestrian and cycle links which tie the scheme into the surrounding area. The design strategy set out in the Design and Access Statement, and the controls exerted by the parameter plans and the Design Code, would combine to create a successful place based on good urban design principles. Overall I consider that the scheme accords with Local Plan Policies 55, 56, 57 and 59.

13.70 Policy 60, which relates to tall buildings and the Cambridge skyline, and Policies 61 and 62 which deal with the historic environment and heritage assets, have also been considered under Matter c). There would be a low level of impact to the Mill Lane Conservation Area. The scheme would appear in relatively few panoramic views. It would slightly break the skyline from a small number of locations, for example Castle Hill Mound, but not to the extent that it would harm the cityscape or the city's setting. The maximum level of harm identified by either witness to any heritage asset is less than substantial. The Porcelanosa building is not listed and although it is of more interesting construction it remains a single storey retail building on a retail park. In my view the impact on heritage assets would be less than substantial at the lowest level and would be substantially outweighed by the public benefits of the scheme For all these reasons the proposal would be in accordance with Local Plan Policies 60, 61 and 62.

13.71 Subject to the conditions discussed in Section 12 of this report, the scheme would be in accordance with a range of development management policies including Policies 28, 29 and 31 (carbon reduction, sustainable design and construction, water use, renewable and low carbon energy generation and integrated water management), Policy 32 (flood risk), Policy 33 (contaminated land), Policy 34 (light pollution), Policy 35 (noise and vibration), Policy 36 (air quality), Policy 37 (Cambridge Airport), Policy 42 (connection to digital infrastructure), Policies 67 and 68 (open spaces), Policies 69, 70 and 71 (biodiversity, habitats and trees), Policies 80, 81 and 82 (access, transport impact and parking), Policy 84 (telecommunications) and Policy 85 (infrastructure delivery).

13.72 For all these reasons, I consider that the proposal would accord with the development plan as a whole.

Overall balance of considerations

13.73 The scheme would deliver strong economic and placemaking benefits on an accessible urban brownfield site. In my view it would accord with the development plan as a whole and with NPPF Chapter 6 (Building a strong, competitive economy) Chapter 7 (Ensuring the vitality of town centres) and 12 (Achieving well-designed places). The negative aspects of the scheme are in my assessment outweighed by the scheme's benefits.

13.74 In coming to this conclusion, I recognise that some people hold strong alternative views of the site's future. Although the scheme is tailored to attract the science and R&D sectors, there is no specific end user of the scheme at this stage; it is based on one (albeit very competent and comprehensive) plan of how the site can be developed to maximise its use whilst controlling the impacts on its surroundings. Against this background, some local residents and councillors have put forward reasonable arguments that development on the site should be approached differently. A mixed use scheme involving residential development, for example, might be more reflective of the land use character of the immediate area to the south and west of the site. The site might be developed to a lower scale, with lesser impacts on neighbouring residents. And though no prematurity case was made at the Inquiry, several objectors have argued that redevelopment of this scale should come through the forthcoming local plan, in which Greater Cambridge's development needs could be considered in the round, with community input.

13.75 Whilst recognising these points, I do not believe that there is anything in the current development plan that should prevent the scheme from being considered on its merits now. I give greater weight to the fact that the scheme as presented would bring many benefits in respect of economic growth, employment and related community benefits, urban design and placemaking, and sustainable transport. These in my view outweigh the harms identified in respect of daylight, sunlight, overshadowing and outlook, the low level of less than substantial harm to heritage assets and the minor townscape impacts. Permission would enable work to commence on reserved matters, whereas deferment to the development plan process would potentially delay the realisation of any benefits. For all the reasons given in this report I believe that the balance falls towards the grant of permission.

14. Recommendation

14.1 For all the above reasons I recommend that planning permission is granted.

Jonathan Bore

INSPECTOR

ANNEX A: APPEARANCES

FOR RAILPEN [THE APPLICANT]

Mr Rupert Warren KC	Instructed by Mills & Reeve LLP

He called:

Mr Guy Kaddish BSc (Hons) DipTP	Planning Partner, Bidwells
Mr David Leonard BA (Hons) BArch (Hons) RIBA, Masterplanning	Director, Leonard Design
Mr Jonathan Lonergan MRICS, LLB, MSC (Surv) Daylight and Sunlight	Director, eb7 Ltd
Mr Alastair Macquire BA (Hons) Dip LA CMLI Townscape	Consultant, Bidwells
Mr Stephen Handforth MSc IHBC Heritage	Director, Handforth Heritage
Mr Alex O'Byrne BSc Socio-economics	Partner, Volterra
Mr Peter Seaborn LLB (Hons) Law	Partner, Mills & Reeve LLP
Ms Jennie Hainsworth MRTPI Planning	Associate, Bidwells

FOR CAMBRIDGE CITY COUNCIL

Mr Josef Cannon KC	Instructed by Cambridge City Council
Dr Lois Lane	

They called:

Mr Andrew Martin MSc Planning	Principal Planner, Greater Cambridge Shared Planning Service
Mr Cuma Ahmet	Greater Cambridge Shared Planning Service
Prepared evidence but was not called:	
Mr Ian Dias BSc (Hons) MRICS Daylight, Sunlight and Overshadowing	Partner, Schroeders Begg (UK) LLP, Chartered Surveyors

INTERESTED PERSONS

Mr M Ball	Better Beehive Group
Ms S Nicholas	Cambridge Past, Present and Future
Cllr N Bennett	Abbey Ward Councillor
Cllr R Robertson	Petersfield Councillor
Cllr Katie Porrer	Speaking on behalf of herself and 4 members of the Planning Committee
Mr M Lucas-Smith	Local Resident
Mr M Rison	Local Resident
Mr N Richardson	Local Resident

ANNEX B: CORE DOCUMENTS

Core documents, proofs of evidence and documents submitted at the Inquiry can all be accessed at: Beehive Centre Public Inquiry

CD Series	Title
1.	Application Documents and Plans (2023 Application)
2.	Application Documents and Plans (2024 Revised Application)
3.	Committee Reports
4.	The Development Plan and Policy
5.	Emerging Development Plan
6.	Call in Documents
7.	Inquiry Documents
8.	Residential Amenity Documents
9.	Documents Referred to in Proofs of Evidence
10.	Referred to in Case Studies
11.	Other Documents

IQ Series	Description
IQ1.01 to IQ1.23	Public Inquiry Documents

ANNEX C: SCHEDULE OF RECOMMENDED CONDITIONS

1. No development on any phase shall commence until details of the appearance, means of access, landscaping, layout and scale, (hereinafter called the 'reserved matters') for that phase have been submitted to and approved in writing by the local planning authority. The development of each phase shall be carried out as approved.

2. Application(s) for approval of the reserved matters for any phase shall be made to the local planning authority before the expiration of ten years from the date of this permission. The development of each phase hereby permitted shall be begun before the expiration of three years from the date of approval of the last of the reserved matters of that phase to be approved.

3. The development hereby permitted shall be carried out in accordance with the approved documents, as listed below, save for where such details are superseded by further details being submitted to and approved in writing by the local planning authority pursuant to the conditions attached to this permission.

    - PO - LDA - ZZ - XX - DR - A – 08000 REV P2 (Site Location Plan)
    - PO - LDA - ZZ - XX - DR - A – 08003 REV P2 (Maximum Building Heights & Plots)
    - PO - LDA - ZZ - XX - DR - A – 08004 REV P2 (Land Use – Ground Floor)
    - PO - LDA - ZZ - XX - DR - A – 08005 REV P2 (Land Use – Upper Floors)
    - PO - LDA - ZZ - XX - DR - A – 08006 REV P2 (Access and Circulation)
    - PO - LDA - ZZ - XX - DR - A – 08007 REV P2 (Landscape and Open Space)
    - Design Code (Leonard Design Architects, dated November 2024).

4. The proposed maximum floorspace of all land uses indicated (including any basements and external bin/cycle stores) shall not exceed a total of 166,685 sqm (gross external area).

5. Prior to or concurrently with the submission of the first of the reserved matters application(s) for any phase of the development, a site wide phasing plan for the development hereby permitted shall be submitted to and approved in writing by the local planning authority. The site wide phasing plan shall identify all phases of the development and the sequence in which they will be developed and shall include a mechanism for its review and amendment. The development shall be carried out in accordance with the approved details.

6. Each reserved matters application shall be accompanied by a report which tests the daylight, sunlight and overshadowing effects of each building to which the reserved matters application relates in accordance with the relevant BRE Guidance: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (BR209 2022 Edition).

    Each such report shall set out the impacts on each identified window and room of all receptor properties and their gardens identified in the Illustrative Scheme results for VSC, NSL, APSH, Winter PSH and BRE 2-hour sunlight test (on 21 March), as set out in tables within appendices 2b, 3b, 4b and 5 to the daylight, sunlight and overshadowing evidence prepared by eb7 and dated 27 May 2025 (the eb7 Appendices). It shall include a full pack of neighbouring window referencing and NSL contour plots for room layout interpretation including neighbouring property reference locators.

Each report shall use the baseline and arrangement of neighbouring properties on which the results in the eb7 Appendices were derived and also take into account the effects of any other building(s) which have been granted reserved matters approval and, for any plots that have not, the footprint and position of the buildings shown for that plot on the Illustrative Masterplan PO-LDA-ZZ-XX-DR-A-08010 Rev P2.

The daylight, sunlight and overshadowing effects of the development shall not amount to any greater Vertical Sky Component loss, No-Sky Line loss, Annual Probable Sunlight Hours loss, Winter Probable Sunlight Hours loss or BRE 2-hour sunlight test loss on 21 March to any of the identified windows and rooms of receptor properties, or their gardens, than those identified in the eb7 Appendices.

7. Prior to commencement of development on any phase (other than site investigation, archaeological works and enabling works to make the site ready for construction), cross sections showing the finished floor levels of all proposed buildings and associated external landscaping within that phase in relation to the existing and proposed ground levels of the surrounding land and buildings shall be submitted for approval to the local planning authority. The development shall be constructed in accordance with the approved details.

8. Prior to the commencement of development on any phase (other than site investigation, archaeological works and enabling works to make the site ready for construction), a demolition and construction environmental management plan for that phase shall be submitted to and approved in writing by the local planning authority. The development of each phase shall be undertaken in accordance with the approved plan.

9. Demolition and construction, and deliveries for those purposes, shall be carried out only between 0800 hours to 1800 hours Monday to Friday, and 0800 hours to 1300 hours on Saturday and at no time on Sundays, Bank or Public Holidays, unless the local planning authority gives written consent to any variation.

10. Any reserved matters application for a phase or building containing plant or equipment likely to generate external noise affecting noise-sensitive premises both within and beyond the site boundary shall be accompanied by a noise assessment for approval by the local planning authority. The noise assessment shall contain details of mitigation measures to be carried out in respect of the noise source and where necessary and appropriate the insulation of the buildings against external noise. The approved details shall be implemented before the relevant phase or building is occupied and shall be retained thereafter in accordance with the approved details.

11. Any reserved matters application for a phase which includes space that is intended to be used for outdoor events likely to generate noise shall include a plan for the approval of the local planning authority containing details for the management and mitigation of such noise to minimise disturbance to nearby noise sensitive premises. The approved details shall be implemented from the first occupation of the relevant phase and maintained thereafter.

12. Reserved matters applications for each phase shall include a scheme for approval by the local planning authority for external and internal artificial lighting within that phase. The scheme shall be designed to minimise light pollution and disturbance to residential properties. The details shall be accompanied by an artificial lighting impact assessment. Each approved lighting scheme shall be fully installed, maintained and operated in accordance with the approved scheme.

13. Prior to the use of any commercial floorspace in which fumes or odours are emitted, details of a scheme for the extraction and filtration of such fumes and odours shall be submitted to and approved in writing by the local planning authority. The scheme shall be fully installed, maintained and operated in accordance with the approved details prior to the premises being brought into use.

14. No laying of services, creation of hard surfaces or erection of buildings shall commence on any phase until a detailed design for the surface water drainage for that phase, including a timetable for implementation and full details of maintenance and adoption, has been submitted to and approved in writing by the local planning authority. The submitted details shall be based upon the principles within Flood Risk Assessment and Drainage Strategy Appendix 8.1A (October 2024). The surface water drainage works shall be carried out in accordance with the approved details for that phase. Any elements of the surface water drainage system within that phase that are not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved maintenance details. An independent report from an appropriately qualified person shall be submitted to the local planning authority on completion of each phase and before its occupation, confirming that the surface water drainage system has been installed in accordance with the approved details.

15. No development of any phase, other than site investigation, shall commence until the following have been submitted to and approved in writing by the local planning authority in relation to that phase:

    - a site investigation strategy in respect of contamination risk based upon the findings of the Preliminary Risk Assessment ref: WIE17469-100-R-5-3-1-PRA, dated July 2024 and the Preliminary Generic Quantitative Risk Assessment, ref: WIE17469-100-R-12-1-2-GQRA, dated February 2023;

    - an intrusive site investigation report; and

    - a remediation strategy.

    The development of each phase shall be undertaken in accordance with the agreed remediation strategy and no occupation of that phase shall take place until a report has been submitted to and approved in writing by the local planning authority demonstrating compliance with the approved remediation strategy. If unexpected contamination is encountered during the development works which has not previously been identified, all works on the relevant phase shall cease immediately and shall not recommence until an intrusive site investigation report and a remediation strategy specific to the newly discovered contamination have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved intrusive site investigation report and remediation strategy.

16. No demolition or development in any phase shall commence until a programme of archaeological work has been undertaken for that phase in accordance with a written scheme of investigation that has been submitted to and approved in writing by the local planning authority.

17. No development above ground level, other than demolition, in any phase shall commence until a hard and soft landscaping scheme for that phase, including long term maintenance and management responsibilities, has been submitted to and approved in writing by the local planning authority. Hard and soft landscaping works within each phase shall be carried out and maintained in accordance with the approved landscaping details. If within a period of ten years from the date of the planting, any tree or plant is removed, uprooted or destroyed or

dies, it shall be replaced within the next planting season by another equivalent tree or plant of the same species and size.

18. Prior to the commencement of development, a site wide biodiversity gain plan shall be submitted to and approved in writing by the local planning authority which shall include the strategic approach to securing a minimum 20% net gain in biodiversity on-site, using the most up to date DEFRA metric.

19. No development shall commence on any phase until a biodiversity gain plan for that phase, which shall be generally in accordance with the site wide biodiversity gain plan, has been submitted to and approved in writing by the local planning authority. The phase biodiversity gain plan shall set out the detailed biodiversity net gain requirements for that phase together with details of implementation, management and monitoring for a period of 30 years for significant habitat enhancements, on-site and off-site as appropriate. Measures for biodiversity gain plan in each phase shall be implemented in full in accordance with the approved plan.

20. Details of the design and maintenance of any biodiverse roof, including the control of access thereto, shall be submitted to and approved in writing by the local planning authority before development of that building above ground level.

21. All reserved matters applications for buildings shall be accompanied by a sustainability statement and an energy statement which shall have regard to the targets and commitments set out within the submitted Sustainability Strategy, Revision 01 (16 August 2024), and the submitted Energy Strategy, Revision 01 (August 2024). The sustainability statement shall be accompanied by a BREEAM pre-assessment for approval by the local planning authority which shall demonstrate that all buildings to which the reserved matters application relates are capable of achieving a minimum of BREEAM excellent with at least 5 credits for Wat01, save that:

    - the pre-assessment shall show that any office floorspace within the reserved matters area shall be capable of achieving BREEAM outstanding with at least 5 credits achieved for Wat01; and

    - the BREEAM requirement shall not relate the multi-storey car park element of Building 10.

    The development shall be carried out in accordance with the approved details.

    Within six months following first occupation of each building, a post construction statement shall be submitted to the local planning authority confirming that the water efficiency provisions relating to that building as set out in relevant sustainability statement have been fully implemented, including the achievement of no less than 5 Wat01 credits.

22. No development above base course of a permanent building, excluding Building 10, shall take place until a detailed scheme for the management and recycling of grey water and/or rainwater for that building, including any necessary infrastructure, has been submitted to and approved in writing by the local planning authority. The development shall be carried out and thereafter maintained in accordance with the approved details.

23. Prior to the installation of any back-up power generator associated with the approved development, or any phase of development, details of the generator shall be submitted to and agreed in writing with the local planning authority. The details shall demonstrate that the operation of the generator will not lead to hourly exceedances of both nitrogen dioxide and particulate matter (PM10) against local air quality management objectives. The approved system shall be installed, maintained and operated in accordance with the approved details.

24. No development except for enabling works shall commence on any phase until a scheme for the on-site storage facilities for commercial waste, including waste for recycling in that phase, has been submitted to and approved in writing by the local planning authority. The approved scheme shall be carried out before the use of that phase is commenced or otherwise in accordance with a programme approved by the local planning authority for that phase and shall be retained thereafter.

25. Prior to the occupation of any phase which includes commercial buildings, a delivery, servicing and emergency vehicle management plan relating to that phase shall be submitted to and approved in writing by the local planning authority. Each such plan shall be based upon the principles within the agreed Appendix 13.4A Delivery and Servicing Plan prepared by Waterman (ref: WIE17469-100-R 6-2-1-DSP) dated August 2024 and shall include details of access arrangements, and any proposed restrictions on permitted hours for service collections / dispatches from and deliveries to the commercial units within that phase (including refuse/ recycling collections where appropriate).

    Each approved delivery, servicing and emergency vehicle management plan shall be implemented in full in accordance with the approved details.

26. All reserved matters applications for a phase which includes buildings shall be accompanied by a parking management plan for that phase, based upon the principles within the agreed Appendix 13.3A Car Parking Management Plan prepared by Waterman (ref: WIE17469-100-5-2-1-PMP) dated August 2024. Each approved phase parking management plan shall be implemented in accordance with its approved details.

27. An electric vehicle charging scheme shall be submitted to and approved in writing by the local planning authority:

    - prior to the setting out of any car parking spaces within the multi-storey car park, and
    - for each phase, prior to the setting out of any car parking in that phase.

    The scheme shall be implemented in accordance with the approved details and maintained and retained thereafter.

28. Before any development within a phase commences (excluding enabling works), details shall be submitted to and approved in writing by the local planning authority to demonstrate that the proposed construction equipment relating to that phase shall not impair the performance of communication, navigational aids and surveillance equipment required for the safe operation of Cambridge Airport. The development of each phase shall be carried out and thereafter operated in accordance with the approved assessment.

29. Development within any phase (excluding enabling works) shall not commence until a bird hazard management plan relating to that phase has been submitted to and approved in writing by the local planning authority. The management plan shall take into account the advice in Combined Aerodrome Safeguarding Team (CAST) Advice Note 3 “Wildlife Hazards Around Aerodromes” (April 2024). Each such plan shall be implemented as approved and shall remain in force for the life of the relevant buildings.

30. No solar photovoltaic panels shall be fixed in place until a glint and glare assessment for such panels has been submitted to and approved in writing by the local planning authority. The installation, operation, and maintenance of the solar photovoltaic panels shall thereafter be in accordance with the approved assessment.

31. Development hereby permitted within the East West Rail safeguarded area (as shown on East West Rail Safeguarding Map – SG-104 drawing ref 133735-EWR-ZO-XXX-PLN-LEP-00104

dated 13 November 2024) shall not prejudice the underlying objectives of such safeguarding nor the safe operation of the railway nor the safe use by pedestrians and cyclists of the Coldhams Lane cycle bridge where it crosses the Fen Line railway.

APPENDIX 7
NEED FOR B2/B8 IN GREATER CAMBRIDGE

NEED FOR B2/B8 IN GREATER CAMBRIDGE

Introduction

1. Tritax Big Box Developments ("Tritax") have instructed Bidwells LLP to undertake a review of the evidence base underpinning the emerging Greater Cambridge Local Plan ("GCLP") as it relates to the need for General Industrial (Use Class B2) and Storage and Distribution (Use Class B8) floorspace and undertake an independent assessment of the objectively assessed need.

2. The documents reviewed from the evidence base comprise:

- GCLP Draft Topic Paper: Jobs, December 2025.
- GCLP Draft Topic Paper: Development Strategy, December 2025.
  - Specifically, Appendix 17: Greater Cambridge Employment Trajectory, October 2025.
- Iceni Greater Cambridge Employment and Housing Needs Update 2024-2045, September 2025 ("the 2025 Update").
- Iceni Greater Cambridge Employment and Housing Evidence Update, January 2023.
- Iceni Greater Cambridge Growth Sectors Study: life science and ICT locational, land and accommodation needs, September 2024.
- Iceni Greater Cambridge Warehouse and Industrial Space Needs, March 2025 ("the WISN report").

Review of the Evidence Base

3. The GCLP evidence base has evolved and fragmented with Iceni producing sector specific reports and several updates. We recommend that for the Regulation 19 consultation a single complete report, dispensing with historical analysis that is no longer relevant, will be essential. As part of this, we recommend that the report includes considerably more supporting data to substantiate the approach taken, which is severely lacking from the September 2025 update. As a leading national logistics developer, Tritax and Bidwells would be happy to engage with the Council on this as per the Planning Practice Guidance that requires *"discussions with developers and property agents and engagement with business and economic forums"* (PPG Paragraph 2a-026-20190220), and specifically in relation to logistics, *"engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies"* (PPG Paragraph 2a-031-20190722).

4. We have not been able to identify at any point in the 2025 Update a table that sets out the number of jobs forecasted to 2045 by industrial sector. The key sectors benefit from some small graphs, but there is no such equivalent for non-key sectors such as industry and warehousing. Without this evidence it is impossible to follow how the labour-based floorspace requirements in Table 5.1 have been calculated.

5. The figure of around 317,000 m² for industry and warehousing set out in paragraph 5.40 of the 2025 Update is not labour-based but instead is derived from a market signals assessment found within the WISN report. The labour-based approach is however still important to understand the compatibility between the two approaches.

6. The WISN report provides a summary of the existing employment sites in Greater Cambridge in terms of their general status and notable occupiers. It does not consider quantitatively vacancy rates, nor

does it include any analysis of the risk of these sites being converted to a non-industrial or warehousing use, which is generally supported in national planning policy and guidance. There is also no analysis whether it would be desirable to retain each of these sites in the current use.

7. The WISN report then seeks to break down the specific use type to which the industrial and warehousing floorspace is being operated as:

    - Manufacturing (general / low tech)
    - Wholesale
    - Distribution
    - Mid-tech and advanced manufacturing

8. It is key to understand that these are not Use Classes, and it is likely that the floorspace is a mixture of B2 and B8, with notable amounts also benefiting from Use Class E(g) business uses (office, research and development, and light industrial). There is nothing to stop floorspace that is subject to multiple use classes from switching use depending on the needs of the occupant at that time. Consequently, it is the overall trend in growth of industrial and warehousing floorspace and the overall changes in employment that are important.

9. The only time it is relevant to consider sub-sectors is when determining the size of units that should be built in the future and therefore the size of the sites that should be allocated. However, this should not be determined based on employment trends historically, which largely reflect the space that is available, not necessarily the space that is needed. Consequently, this part of the assessment should be focused on future requirements based on market knowledge from local agents.

10. Another important distinction that the WISN makes is to discount any warehousing needs that do not meet the specific needs of the Greater Cambridge market, including those serving the rest of Cambridgeshire (WISN Paragraph 5.2). This is somewhat naive since there will be significant overlap between the needs of local occupiers versus others and once allocated, the Councils have limited control over who occupies the space that is built. It is understood that this is an attempt to limit the number of very large floorplates which generally have greater building heights, but manipulating and constraining the objectively assessed need for floorspace in this way is clearly contrary to national planning policy and guidance. It is likely that constraining the supply in this way will only result in the continued undersupply of industrial and warehousing floorspace, particularly if national and regional occupiers are able to out-bid smaller local occupiers for the same floorspace.

11. Consequently, we are concerned that:

    - A lack of transparency in the analysis due to a lack of quantitative evidence.
    - No meaningful analysis of whether existing industrial and warehousing sites may continue to operate as such or may be under pressure from alternative uses.
    - An over complicated analysis of employment trends to determine future needs with little consideration, based on local agent advice, of how this may change in the future.
    - A fundamental concern that the objectively assessed need for industrial and warehousing floorspace is being constrained by perceived environmental factors, contrary to national planning policy and guidance.

An Alternative Approach

Understanding Market Suppression

12. Not every local market will have the same profile of industrial sectors by employment, floorspace or output (measured as Gross Value Added (GVA)). If this was the case, specialisms such as Greater Cambridge could not happen. However, despite these specialisms every local market needs a diverse range of sectors to function and consequently comparisons between different geographies can be useful to determine where there are deficiencies. Deficiencies can occur for many reasons, including market failures, but also policy interventions.

13. In the case of Greater Cambridge, a side effect of the focus on research and development (R&D) has been to suppress the ability of other industrial sectors to grow. Policy P9/7 of the Cambridgeshire and Peterborough Structure Plan (2003) stated that:

> *"Policy P9/7 – Selective Management of Employment Development*
>
> *Employment land in and close to Cambridge will be reserved for development which can demonstrate a clear need to be located in the area in order to serve local requirements or contribute to the continuing success of the Sub-Region as a centre of high technology and research. Development proposals must demonstrate that they fall into one or more of the following categories:*
>
> *a) high technology and related industries and services concerned primarily with research and development including development of D1 educational uses and associated sui generis research institutes, which can show a special need to be located close to the Universities or other established research facilities or associated services in the Cambridge area;*
>
> *b) other small-scale industries which would contribute to a greater range of local employment opportunities, especially where this takes advantage of, or contributes to the development of, particular locally based skills and expertise;*
>
> *c) the provision of office or other development providing an essential service for Cambridge as a local or Sub-Regional centre."*

14. Even before this, the 1995 Structure Plan Policy SP5/3 stated that:

> *"Within the Cambridge area, land will be reserved for development which has a clear need to be located close to the city in order to serve local requirements or to contribute to the continuing success of Cambridge as a major centre for research and development."*

15. While Policy SP5/4 stated that:

> *"Provision has been made within Policy SP5/1 to meet the land requirements of high technology and related industries. Particular attention will be paid to the need to preserve and enhance the special character of Cambridge, and to the need to create conditions suitable for high technology growth in other parts of the county outside the city. Firms who do not need close physical proximity to the city will be encouraged to locate elsewhere in the county."*

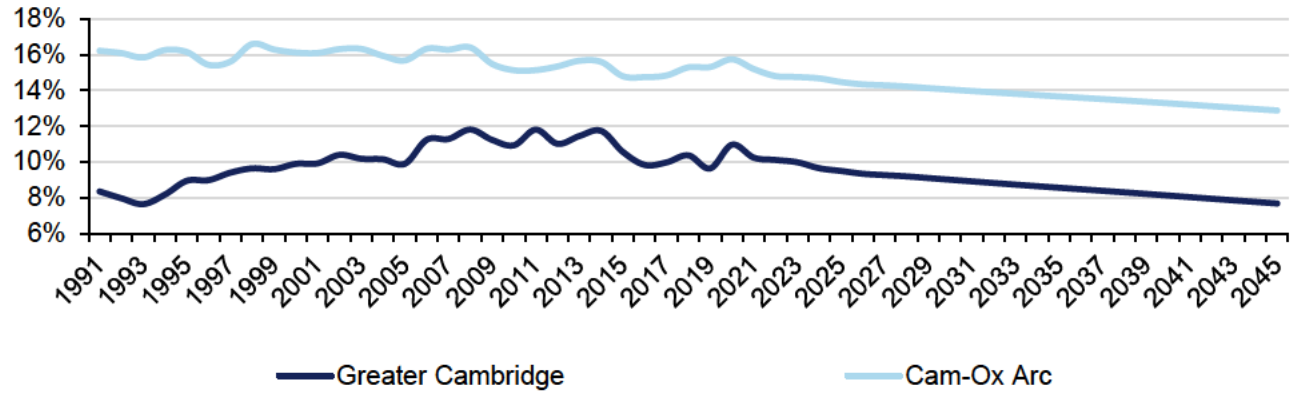
16. By 2024, Oxford Economics local forecasts (April 2025) showed that only 9.7% of the total GVA generated by Greater Cambridge was from the Manufacturing and Transport and Storage sectors ("the B2/B8 sectors"), compared to 14.7% for the entire Cambridge to Oxford Arc (**Figure 1**). Clearly there has been an intentional suppression of these industrial sectors in Greater Cambridge through planning

policy since at least the 1990s and is now manifesting itself through a notable difference in economic output.

17. Note that the industrial sector names referred to in this assessment are the names of the sections set out in the UK Standard Industrial Classification 2007 (SIC2007). Each section is given a letter: 'C' for Manufacturing and 'H' for Transport and Storage.

18. While Iceni has sought to use various sub-sectors to measure the employment most likely associated with floorspace operating in certain use classes, given that much of the data used is subject to notable caveats, such detailed analysis is unlikely to provide the level of accuracy that Iceni intends. Bidwells preferred approach is to use the SIC sections rather than sub-sectors in most cases since these are likely to be the most accurate at the local authority level. For B2 and B8 floorspace, there is a clear synergy with the C and H sections and therefore we apply these as "the B2/B8 sectors".

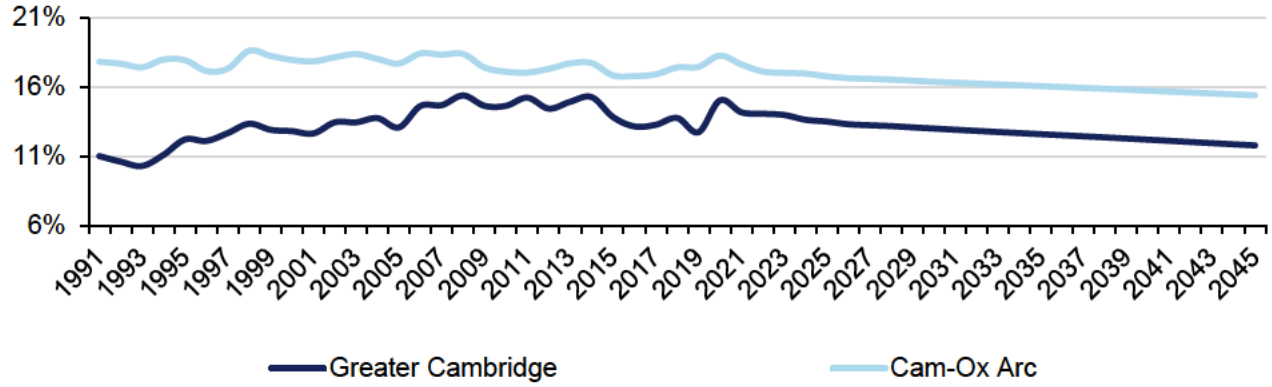
Figure 1: The B2/B8 sectors GVA as a percentage of total GVA



Source: Bidwells analysis of Oxford Economics data

19. However, as discussed above, this suppression was implemented at the time for the purposes of developing Greater Cambridge's specialist R&D industries, which principally fall within the Information and Communication (SIC code J) and the Professional, Scientific and Technical Activities (SIC code M) sectors ("the R&D sectors"). If these are removed from the total GVA and the percentage is recalculated the B2/B8 sectors account for 13.6% of GVA while across the Arc they account for 17.0% (**Figure 2**). The gap has reduced but is still clearly notable and therefore, arguably, suppression of around 3.4% exists once adjusted for Greater Cambridge's specialisms. In this instance we have based our analysis on the latter excluding the R&D sectors, but have included sensitivity analysis with these included.

Figure 2: The B2/B8 sectors GVA as a percentage of total GVA minus the R&D sectors



Source: Bidwells analysis of Oxford Economics data

Industrial Floorspace

20. The Valuation Office Agency (VOA) produces estimates of 'industrial' floorspace for each local authority each year with the current dataset covering the period 2011-2025. The term industrial can cover a multitude of uses and does not align well with the use class system. Furthermore, uses can change as can their use class, meaning that any measure of floorspace in terms of the industrial sector using it and the use class that is currently active must come with a host of caveats.

21. Iceni have tried to address this by trying to separate out floorspace that could be used for B2/B8 but is probably currently in E(g) use. We can understand why Iceni have sought to do this but ultimately, we consider this to cause more problems than it solves: if this floorspace retains the possibility for use as B2/B8 it might occur in the future. Equally, it is inevitable that some B2/B8 floorspace proposed in the future will also be taken up by E(g) uses. Ultimately, this is an important flexibility within the planning system that economic modelling needs to address rather than seek to constrain.

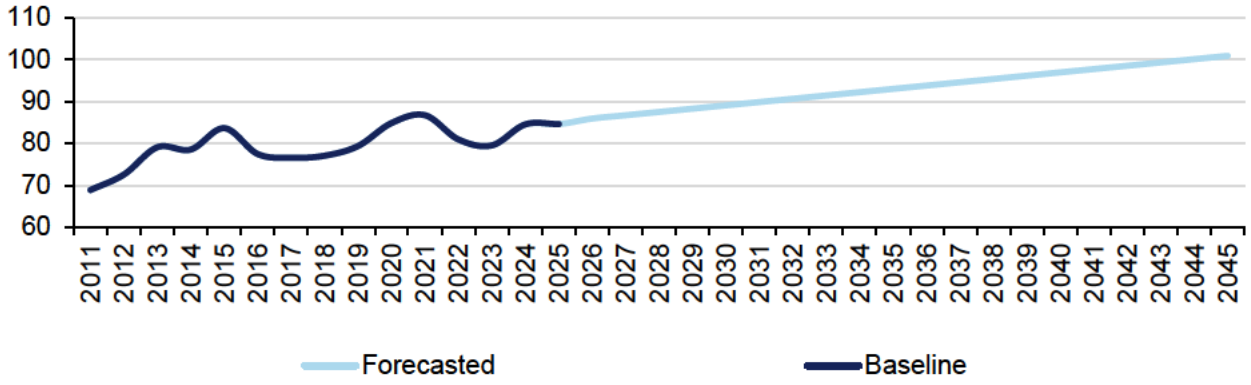
22. Taking this into account, we have simply assumed that the VOA industrial floorspace is occupied by the B2/B8 sectors.

Economic Rate Comparisons

23. One way to test if our assumption that all industrial floorspace can be treated as B2/B8 is to generate rates that can be independently verified. For example, using the industrial floorspace from VOA and the employment estimates for the B2/B8 sectors from Oxford Economics, it is estimated that over the period 2011-2025 that average employment density in Greater Cambridge has been 80m2 per job. This is entirely reasonable and comparable to industrial standards and benchmarks such as those set out in the HCA Employment Densities Guide (2015).

24. These employment densities also exhibit an expected trend with densities decreasing from 69m² per job in 2011 to 85m² per job in 2025, which reflects increased automation in these sectors.

Figure 3: Change in average employment densities for B2/B8 floorspace in Greater Cambridge



Source: Bidwells analysis of Oxford Economics and VOA data

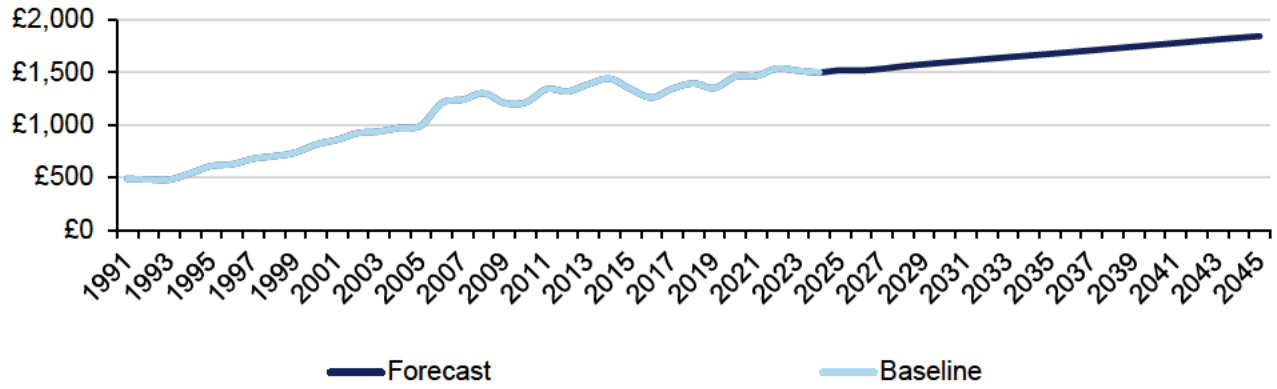
The Forecast

25. For this exercise we have based our B2/B8 sector floorspace upon the Oxford Economics forecasts for Greater Cambridge. These forecasts suggest that employment will reach 305,000 jobs in 2045, which falls between Iceni's Central (300,200 jobs) and High (318,300 jobs) scenarios. Unfortunately, we have not been able to find a breakdown of jobs by industry in the Iceni report, which highlights our concern regarding the lack of supporting data in the assessment. Without this we cannot make further comparisons on employment.

26. The Iceni scenarios suggest considerably less employment than those set out in the Oxford Economics report produced for the MHCLG. This report suggests that the Greater Cambridge area could reach 465,000 jobs by 2050. Therefore, it would appear highly likely that Iceni's central scenario could be comfortably exceeded by 2045.

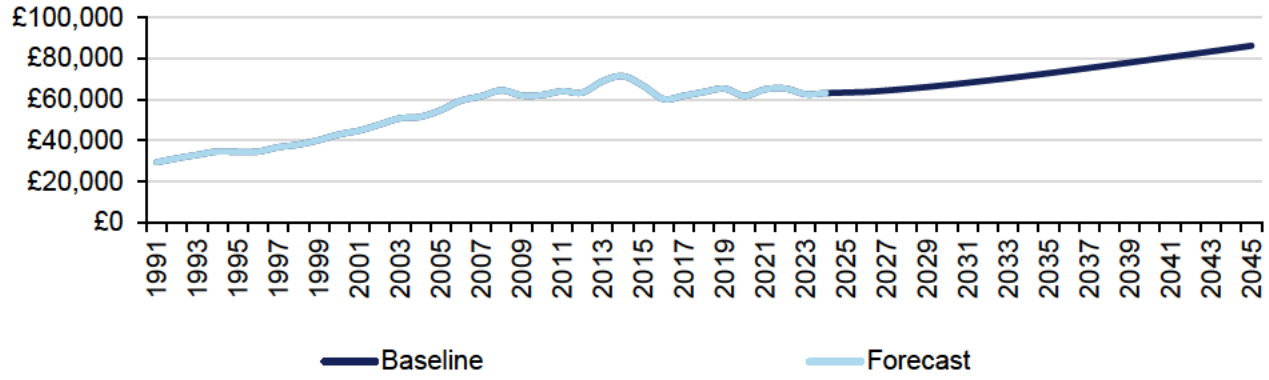
27. Our preferred approach to forecasting is to primarily use GVA by industry. GVA is an exceptionally stable dataset and is therefore ideal for long term forecasting (**Figure 4**). By then forecasting the GVA per job rate (**Figure 5**), GVA can be readily converted to jobs and the forecasted floorspace per job (employment density, **Figure 3** above) can then convert this to floorspace.

Figure 4: Output from the B2/B8 sectors 1991-2045 (GVA, £m)



Source: Bidwells analysis of Oxford Economics data

Figure 5: GVA per job from the B2/B8 sectors 1991-2045



Source: Bidwells analysis of Oxford Economics data

28. To reflect suppression, we take the percentage GVA of the B2/B8 sectors seen in 2045 in Greater Cambridge (7.7% as shown in **Figure 1**) and increase this to reflect the percentage for the entire Arc (12.9%) this is converted to floorspace as described above. From this the known floorspace in 2024 is subtracted to estimate that gross need. From this the commitments set out in the Iceni reports of 28,595m^2 are removed to determine the overall need. **The result of this is a need of 948,300m^2 net additional B2/B8 floorspace**.

29. This is clearly a substantial increase in floorspace and reflects modelling for the whole economy. However, as set out previously, it would be more appropriate to remove the specialist R&D sectors before making comparisons between geographies. Using the same method as above but instead applying the difference between Greater Cambridge and the Arc seen in **Figure 2**, **this results in a need for 424,900m^2 net additional B2/B8 floorspace**.

30. Note that we have not included any adjustments for vacancies or flexibility in this. Since this assessment has considered total industrial floorspace throughout, vacant floorspace assumptions are embedded. In terms of flexibility, we consider the adjustment in GVA to reflect sufficient flexibility if the figure is considered a minimum in accordance with the NPPF.

31. Note also that no distinction is made between local needs and national/regional needs in this assessment, as discussed in Paragraph 10 above.

APPENDIX 8
CAMBRIDGE NORTH APPEAL DECISION (PINS REFERENCE: 3315611)

Ministry of Housing, Communities & Local Government

www.gov.uk/mhclg

RIGHT TO CHALLENGE THE DECISION IN THE HIGH COURT

These notes are provided for guidance only and apply only to challenges under the legislation specified. If you require further advice on making any High Court challenge, or making an application for Judicial Review, you should consult a solicitor or other advisor or contact the Crown Office at the Royal Courts of Justice, King's Bench Division, Strand, London, WC2 2LL (0207 947 6000).

The attached decision is final unless it is successfully challenged in the Courts. The Secretary of State cannot amend or interpret the decision. It may be redetermined by the Secretary of State only if the decision is quashed by the Courts. However, if it is redetermined, it does not necessarily follow that the original decision will be reversed.

SECTION 1: PLANNING APPEALS AND CALLED-IN PLANNING APPLICATIONS

The decision may be challenged by making an application for permission to the High Court under section 288 of the Town and Country Planning Act 1990 (the TCP Act).

Challenges under Section 288 of the TCP Act

With the permission of the High Court under section 288 of the TCP Act, decisions on called-in applications under section 77 of the TCP Act (planning), appeals under section 78 (planning) may be challenged. Any person aggrieved by the decision may question the validity of the decision on the grounds that it is not within the powers of the Act or that any of the relevant requirements have not been complied with in relation to the decision. An application for leave under this section must be made within six weeks from the day after the date of the decision.

SECTION 2: ENFORCEMENT APPEALS

Challenges under Section 289 of the TCP Act

Decisions on recovered enforcement appeals under all grounds can be challenged under section 289 of the TCP Act. To challenge the enforcement decision, permission must first be obtained from the Court. If the Court does not consider that there is an arguable case, it may refuse permission. Application for leave to make a challenge must be received by the Administrative Court within 28 days of the decision, unless the Court extends this period.

SECTION 3: AWARDS OF COSTS

A challenge to the decision on an application for an award of costs which is connected with a decision under section 77 or 78 of the TCP Act can be made under section 288 of the TCP Act if permission of the High Court is granted.

SECTION 4: INSPECTION OF DOCUMENTS

Where an inquiry or hearing has been held any person who is entitled to be notified of the decision has a statutory right to view the documents, photographs and plans listed in the appendix to the Inspector's report of the inquiry or hearing within 6 weeks of the day after the date of the decision. If you are such a person and you wish to view the documents you should get in touch with the office at the address from which the decision was issued, as shown on the letterhead on the decision letter, quoting the reference number and stating the day and time you wish to visit. At least 3 days notice should be given, if possible.

Department for Levelling Up, Housing & Communities

Our ref: APP/W0530/W/23/3315611
Your ref: 22/02771/OUT

Mrs Katrina Aslan-Tipler

katrina.aslan-tipler@mills-reeve.com

By email only

23 April 2024

Dear Madam

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78
APPEAL MADE BY BROOKGATE LAND LIMITED ON BEHALF OF THE CHESTERTON PARTNERSHIP AT LAND TO THE NORTH OF CAMBRIDGE NORTH STATION, CAMBRIDGE
APPLICATION REF: 22/02771/OUT
This decision was made by Minister of State for Housing, Planning and Building Safety, Lee Rowley MP, on behalf of the Secretary of State.

1. I am directed by the Secretary of State to say that consideration has been given to the report of Lesley Coffey BA(Hons) BTP MRTPI, who held a public local inquiry from 6 June 2023 into your client's appeal against the failure of South Cambridgeshire District Council to determine your client's hybrid application for planning permission for **a)** An outline application (all matters reserved apart from access and landscaping) for the construction of three new residential blocks providing up to 425 residential units and providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)); and two commercial buildings for Use Classes E(g) i (offices), ii (research and development) providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), together with the construction of basements for parking and building services, car and cycle parking and infrastructure works and demolition of existing structures and **b)** A full application for the construction of three commercial buildings for Use Classes E(g) i (offices) ii (research and development), providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), with associated car and cycle parking, a multi storey car and cycle park, together with the construction of basements for parking and building services, car and cycle parking and associated landscaping, infrastructure works and demolition of existing structures, in accordance with application Ref. 22/02771/OUT dated 14 June 2023.

2. On 24 March 2023, this appeal was recovered for the Secretary of State's determination, in pursuance of section 79 of, and paragraph 3 of Schedule 6 to, the Town and Country Planning Act (TCPA) 1990.

Department for Levelling Up, Housing & Communities
Lewis Thomas, Decision Officer
Planning Casework Unit
3rd Floor Fry Building
2 Marsham Street
London SW1P 4DF

Email: PCC@levellingup.gov.uk

Inspector's recommendation and summary of the decision

3. The Inspector recommended that the appeal be allowed, and planning permission be granted subject to conditions.

4. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions, except where stated, and agrees with her recommendation. He has decided to allow the appeal. The Inspector's Report (IR) is attached. All references to paragraph numbers, unless otherwise stated, are to that report.

Environmental Statement

5. In reaching this position, the Secretary of State has taken into account the Environmental Statement which was submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the environmental information submitted before the inquiry/hearing opened. Having taken account of the Inspector's comments at IR1.17, the Secretary of State is satisfied that the Environmental Statement and other additional information provided complies with the above Regulations and that sufficient information has been provided for him to assess the environmental impact of the proposal.

Procedural Matters

6. The Secretary of State notes that the Inquiry was adjourned on 23 June 2023 in order to allow for further work to be completed in relation to water neutrality. This information was received on 6 October 2023, and the parties subsequently commented on it. He also notes that parties were invited to comment on the revised National Planning Policy Framework (the Framework) and Written Ministerial Statement (WMS) published on 19 December 2023. The Secretary of State does not consider that the further work in relation to water neutrality nor publication of the revised Framework and WMS raises any matters which would require him to refer back to the parties for further representations prior to reaching his decision on this appeal, and he is satisfied that no interests have thereby been prejudiced.

Matters arising since the close of the inquiry

7. Mandatory biodiversity net gain (BNG) has only been commenced for planning permissions granted in respect to an application made on or after 12 February 2024. Permissions granted for applications made before this date, such as the appeal subject to this letter, are not subject to mandatory BNG.

8. On 8 March 2024, the Secretary of State wrote to the main parties to afford them an opportunity to comment on the Joint statement on addressing water scarcity in Greater Cambridge, published on 6 March 2024. A list of representations received in response to this letter is at Annex A. These representations were circulated to the main parties on 25 March 2024. Copies of the letters listed in Annex A may be obtained on request to the email address at the foot of the first page of this letter.

Policy and statutory considerations

9. In reaching his decision, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act (PCPA) 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

10. In this case the development plan consists of the South Cambridgeshire Local Plan (SCLP) 2018 and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021). The Secretary of State considers that relevant development plan policies include those set out at IR4.6.

11. Other material considerations which the Secretary of State has taken into account include the Framework and associated planning guidance (the Guidance), as well as the December 2023 WMS addressing the Government's vision for Cambridge, and the March 2024 Joint Statement on addressing water scarcity in Greater Cambridge. A revised version of the Framework was published on 19 December 2023 and amended on 20 December 2023.

12. In accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the LBCA Act), the Secretary of State has paid special regard to the desirability of preserving those listed buildings potentially affected by the proposals, or their settings or any features of special architectural or historic interest which they may possess.

Emerging plans

13. Paragraph 48 of the Framework states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework.

Emerging North East Cambridge Area Action Plan (NECAAP)

14. The site falls within the boundary of the emerging NECAAP. As set out by the Inspector in IR 4.9-4.11, the Proposed Submission version has been approved for public consultation but is dependent on the approval of the Waste Water Treatment Plant (WWTP) Development Consent Order (DCO). The consultation process is therefore paused.

15. The Secretary of State agrees with the Inspector that the NECAAP should attract very limited weight, following assessment against Parargaph 48 of the Framework. While the plan is at a relatively late stage of preparation, the NECAAP is being prepared on the basis that the existing WWTP will be relocated to Green Belt land. As noted by the Inspector in IR4.11, there are numerous unresolved objections to this approach. This presents a barrier to the strategic comprehensive approach within the NECAAP policies. Examination of the DCO has been completed and its findings will be provided to the relevant Secretary of State no later than 17 July 2024, and prior to the conclusion of this process, the NECAAP should continue to be given very limited weight.

Emerging Greater Cambridge Local Plan

16. The emerging plan comprises the Greater Cambridge Joint Local Plan, which is being prepared jointly by Cambridge City Council and South Cambridgeshire District Council.

17. The emerging Greater Cambridge Local Plan is at an early stage of preparation. In accordance with paragraph 48 of the Framework, the Secretary of State agrees with the Inspector at IR4.12 that very limited weight can be given to this plan.

Main issues

18. The Secretary of State agrees with the Inspector that the main issues are those set out in IR14.1.

Design and Layout

19. The Secretary of State has given regard to the segregation of residential and employment uses within the development layout. For the reasons set out at IR14.3-14.9, the Secretary of State agrees with the Inspector's conclusion that the separation of the residential and commercial uses would assist with providing the best quality of accommodation for each use and would not give rise to an inactive frontage.

20. For the reasons set out in IR14.11, the Secretary of State agrees with the Inspector's conclusion to not afford the Townscape Strategy any significant weight.

21. The Secretary of State notes the discussion regarding buildings S06 and S07 at IR14.13 - IR14.16 and agrees with the Inspector's conclusion at IR14.16 that there is no reason why the buildings proposed as part of the outline application cannot adopt a similar design approach. For the reasons set out in IR14.17 the Secretary of State agrees that wider gaps between S06 and S07 would detract from the overall masterplan.

22. For the reasons set out in IR14.18-19, the Secretary of State agrees with the Inspector in her disagreement with the Council's view that there is a lack of distinction between Milton Avenue and Station Row, such that there is not a legible street network with a strong sense of place.

23. The Secretary of State has noted that guidance on heights varies between emerging local policy documents (IR14.20). For the reasons set out in IR14.22-IR14.23, he agrees with the Inspector that Building S04 would not be overbearing, and that it would provide a successful transition between One Cambridge Square and the proposed residential use (IR14.23).

24. For the reasons set out in IR14.24 - IR14.26 the Secretary of State agrees building S04 would be acceptable in townscape terms.

25. For the reasons set out in IR14.28 and IR 14.30 - IR14.31, the Secretary of State agrees with the Inspector's conclusion that the footprint, articulation and proposed materials of Buildings S06 and S07 combine to provide high-quality, well-designed buildings.

26. For the reasons given in IR14.36-IR14.41, the Secretary of State agrees with the Inspector's conclusion at IR14.42 that the proposal would deliver a high quality design and a distinctive sense of place in accordance with Policies HQ1 and SS/4 of the Local Plan. For the reasons set out in IR14.85 - IR14.90, he also agrees with the Inspector's conclusion at IR14.90 that the proposal as a whole would respect and retain the character and distinctiveness of the local landscape, including the River Cam corridor, and would therefore comply with Policies HQ/1 and NH/8. The Secretary of State gives this moderate weight.

Landscape and Visual Effects

27. For the reasons given at IR14.20, the Secretary of State agrees with the Inspector's approach, that the proposed buildings, including height, falls to be assessed in terms of

their contribution to the townscape of the proposal and any harm to the wider landscape due to the very limited weight which can currently be given to the NECAAP.

28. The Secretary of State notes the Inspectors view in IR14.49 regarding height guidance within various documents, and her conclusion that the issue is whether there would be an adverse impact on character and appearance of surrounding landscape.

29. The Secretary of State has noted the key characteristics of the River Cam Valley as set out at IR14.55, and for the reasons given in IR14.56-65, he agrees with the conclusions of the Inspector that the development would result in a moderate adverse landscape impact to the River Cam Corridor (IR14.61), comprising a moderate negative to Fen Road, and moderate/minor adverse, reducing to minor and neutral to the south, on the Chesterton residential area (IR14.65). In respect of visual effects and having carefully considered the Inspector's analysis at IR14.66-87, the Secretary of State agrees with the Inspector's conclusions that the key characteristics of the Local Character Area would be maintained (IR14.88) He further agrees with the Inspector's conclusion at IR14.88 that while harm is identified to a number of viewpoints, the limitations to the harm within the viewpoints means that the visual harm from these locations is not representative of the impact of the scheme on the River Cam corridor overall.

30. The Secretary of State agrees with the Inspector's overall conclusions at IR14.90, that that the proposal would harm the character and appearance of the surrounding landscape, but such harm would be limited and generally localised and is mainly due to the change in the character of the site from a largely brownfield site to a new Urban Quarter. The Secretary of State agrees that considered in the context of the allocation of the site within the development plan, the proposal as a whole would respect and retain the character and distinctiveness of the local landscape, including the River Cam corridor, and comply with Policies HQ/1 and NH/8. He assigns this moderate weight.

Heritage Assets

31. The Secretary of State has considered the Inspector's analysis of the impact on the settings of the Riverside and Stourbridge Conservation Area (CA) and the Fen Ditton CA (IR14.94-14.109). The Secretary of State notes the key characteristics of the Riverside and Stourbridge CA (IR14.94-14.96), which forms part of a green wedge which extends from the city centre to the boundary of the city, its historic character, and that its significance is derived in part from the ancient town fair that grew up around the leper hospital on Barnwell Abbey . He notes the Inspector's statement that the setting of this CA makes a limited contribution to its significance. For the reasons set out at IR14.97, the Secretary of State agrees that the proposal would result in less than substantial harm to the significance of the CA, at the lowest end of the scale.

32. The Secretary of State also notes the Inspector's statement at IR14.100 that the setting of the Fen Ditton CA contributes to its heritage significance in that it ties the village to the surrounding agricultural land and the historic importance of the river. For the reasons set out at IR14.104-107, the Secretary of State agrees with the Inspector's conclusion that the proposal would slightly impact the significance of the CA as more buildings would be noticeable in views out from the area to its wider setting, and in this regard there would be some very limited conflict with Policy NH/14 that seeks to sustain and enhance the significance of heritage assets. He also agrees that harm will be less than substantial, and towards the lowest end of the scale. In accordance with paragraph 205 (formerly 199) of the Framework, he assigns great weight to these heritage impacts.

Water Supply and Quality

33. The Secretary of State has carefully considered the effects of the proposal upon water supply. The Secretary of State has noted the Inspector's judgement at IR14.169 that while water quality and supply is a material consideration, the proposal would not in itself harm water quality or water resources, but that cumulative impacts of the appeal proposal with other development would add to demand for water.

34. The Inspector acknowledges in this context that a sustainable supply of water for the Cambridge Water area may not be available for several years (until after the Grafham Transfer is operational). The Inspector leaves for the Secretary of State 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 proposal, together with other development, would avoid placing an unacceptable demand on water resources and potentially harm ecological interests (IR14.173).

35. The Inspector proposed an optional condition be placed on an approval which would delay the occupation of development until either the Grafham Transfer Water supply option is operational or the Water Resources Management Plan (WRMP) for the Cambridge Water operating area is approved (IR14.174).

36. Since the conclusion of the Inquiry and the recommendation made by the Inspector, the March 2024 Joint Statement on addressing water scarcity in Cambridge has been published by the Department for Levelling Up, Housing and Communities (DLUHC), Department for Environment Food and Rural Affairs (Defra), the Environment Agency and Greater Cambridge Shared Planning Service (which manages the planning service for Cambridge City Council and South Cambs District Council). This statement announces the development of a water credits market to supplement and potentially accelerate delivery of the water management measures to meet all of the areas future water needs being promoted by Cambridge Water through its WRMP, alongside wider communications to reduce water use in the area. Paragraph 9 of the Joint Statement states that modelling demonstrates that the scheme should deliver water savings that are sufficient to address concerns raised around sustainable water supply to the Cambridge area.

37. In the context of the publication of the Joint Statement, the Secretary of State considers that the proposal accords with Policies CC/4 and CC/7, and with national policy on water use and supply, and would not have an unacceptable consequence on water supply and quality. As a result, the Secretary of State considers the proposed optional condition is not necessary, and considers that matters relating to water supply and quality are neutral in the planning balance.

Occupant amenity

38. The Secretary of State has had regard to the Inspector's assessment of the illustrative design in terms of living conditions for future occupants. He notes that parameter plans would allow for flexibility in the layout and design of the proposed dwelling to limit the number of single aspect dwellings (IR14.126). For the reasons set out in IR14.126, the Secretary of State agrees with the inspector that the proposed dwellings would provide suitable living conditions for future residents within the constraints of the parameter plans (14.127).

Comprehensive vision

39. For the reasons set at IR14.128-14.132 the Secretary of State agrees with the Inspector that the development plan for the appeal site identifies the site for employment focussed development. He also agrees that the failure to comply with the Development Capacity Assessment, which has not been subject to consultation and is not part of the development plan, does not add weight against the proposal (IR14.133).

40. For the reasons set out at IR14.134, the Secretary of State agrees that the proposed development needs to mitigate its impact on the services and infrastructure (IR14.134). He also agrees with the Inspector that there is no substative contrary evidence to support reaching a different conclusion to the Council and Local Highway Authority, who are satisfied that subject to the planning obligations, the proposal would not prejudice the future development of the wider area.

Other matters

41. For reasons given at IR14.135 – 14.137 the Secretary of State agrees with the Inspector's conclusion at 14.138 that the proposal would be acceptable in terms of its impact on the highway network and would make appropriate provision for sustainable travel. He assigns neutral weight to this consideration.

Benefits of the proposal

Environmental

42. The Secretary of State notes the Inspector's statement at IR14.185 that the proposed development would reuse brownfield land in accordance with paragraph 120 (c) of the Framework (now 124 (c)). The Inspector also notes the proposed development will deliver a scheme with BREEAM Excellent certification as a minimum, would include water efficiency measures, would use SuDS and prioritise non-motorised and public transport. Additionally, the Inspector considers the provision of about 80.27% BNG would be a further significant benefit of the proposal (IR14.186).

43. Taken together and in accordance with paragraph 124 (c) of the Framework, the Secretary of State gives substantial weight to these environmental benefits.

Open space and recreation

44. The Inspector considers that the proposal would include attractive, well designed public open spaces at Chesterton Square and the Piazza (IR14.183). The Secretary of State agrees with this statement, and also agrees that the weight attributed to the Wild Park should not be reduced, and collectively assigns moderate weight to these benefits.

45. The Secretary of State also assigns moderate weight to wider outdoor space provision within the public realm, which will create space for collaboration, supporting well-being and social inclusion (IR14.184).

Office and commercial laboratory space

46. For the reasons given at IR14.110 - IR14.123, the Secretary of State agrees with the Inspector's conclusions at 14.124 that the proposal would assist with meeting the shortfall in laboratory and office floorspace in the short and medium term. He also agrees it would contribute to the continued growth of the Research and Development cluster in North

East Cambridge area, in accordance with Policies E/9, SS/4 and S/5 as well as national planning policy and that it would also be consistent with the Government's Cambridge Vision, as referenced in the WMS (IR14.89). The Secretary of State notes the Inspector's statement that there is no ceiling for the delivery of office and laboratory floorspace (IR14.176), and assigns great weight to this benefit.

47. The Secretary of State notes the Inspector's conclusion that the proposal would comply with Policy SS/4 and the Government's vision for Cambridge 2040 in that it would help to deliver a new Urban Quarter with a focus on employment. The Inspector states that great weight should be assigned to economic benefits. In accordance with paragraph 85 of the Framework, the Secretary of State assigns significant weight to economic growth and productivity benefits, and driving innovation.

Housing land supply

48. The Secretary of State has noted that the parties agree the delivery of housing and affordable housing is a benefit of considerable weight (IR14.182). The Secretary of State agrees the delivery of housing and affordable housing carries considerable weight.

Planning conditions

49. The Secretary of State had regard to the Inspector's analysis at IR13.1-13.30, the recommended conditions set out at the end of the IR and the reasons for them, and to national policy in paragraph 56 of the Framework and the relevant Guidance. The Secretary of State is satisfied, with the exception of draft condition 49 (which addresses water supply as discussed in paragraph 37 above), that conditions recommended by the Inspector comply with the policy test set out at paragraph 56 of the Framework and that the conditions set out at Annex D should form part of his decision.

Planning obligations

50. The Secretary of State has had regard to the Inspector's analysis at IR12.1-12.23, the planning obligation dated 13 July 2023, paragraph 57 of the Framework, the Guidance and the Community Infrastructure Levy (CIL) Regulations 2010, as amended. For the reasons given at IR12.1-12.23, he agrees cwith the Inspector's conclusion that the obligation complies with Regulation 122 of the CIL Regulations 2010 and the tests at paragraph 57 of the Framework.

Planning balance and overall conclusion

51. For the reasons given above, the Secretary of State considers that the appeal scheme is in accordance with Policies CC/4, CC/7, NH/8, SS/4, S/5, E/9 and HQ/1 of the development plan, and there is some very limited conflict with Policy NH/14. Overall, he concludes that it is compliant with the development plan when taken as a whole. He has gone on to consider whether there are material considerations which indicate that the proposal should be determined other than in line with the development plan.

52. Weighing in favour of the proposal is a design which would deliver a high quality sense of place which carries moderate weight; the need for office and laboratory space which carries great weight; and other economic benefits which carries significant weight; the delivery of housing and affordable housing which carries considerable weight; environmental measures including the reuse of the brownfield site, its sustainable location, BREEAM 2018 Excellent certification, water efficiency and BNG which carries substantial weight and the provision of public realm and open space, which carries

moderate weight and its benefits via well-being and social inclusion, which also carries moderate weight.

53. Weighing against the proposal are the less than substantial harm to Riverside and Stourbridge and Fen Ditton CAs which carries great weight.

54. In line with the heritage balance set out at paragraph 208 (formerly 202) of the Framework, the Secretary of State has considered whether the identified 'less than substantial' harm to the significance of the Riverside and Stourhead and Fen Ditton CAs is outweighed by the public benefits of the proposal. Taking into the account the public benefits of the proposal as identified in this decision letter, overall, the Secretary of State concludes that the benefits of the appeal scheme are collectively sufficient to outbalance the identified 'less than substantial' harm to the significance of the designated heritage assets. He considers that the balancing exercise under paragraph 208 of the Framework is therefore favourable to the proposal.

55. Overall, in applying s.38(6) of the PCPA 2004, the Secretary of State considers that despite the very limited conflict with the development plan, there is overall compliance with the development plan. Furthermore, material considerations in this case indicate that permission should be granted.

Formal decision

56. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. He hereby allows your client's appeal and grants planning permission subject to the conditions set out in Annex B of this decision letter for **a)** An outline application (all matters reserved apart from access and landscaping) for the construction of three new residential blocks providing up to 425 residential units and providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)); and two commercial buildings for Use Classes E(g) i (offices), ii (research and development) providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), together with the construction of basements for parking and building services, car and cycle parking and infrastructure works and demolition of existing structures and **b)** A full application for the construction of three commercial buildings for Use Classes E(g) i (offices) ii (research and development), providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), with associated car and cycle parking, a multi storey car and cycle park, together with the construction of basements for parking and building services, car and cycle parking and associated landscaping, infrastructure works and demolition of existing structures, in accordance with application Ref. 22/02771/OUT dated 14 June 2023.

57. This letter does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than section 57 of the TCPA 1990.

Right to challenge the decision

58. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged. This must be done by making an application to the High Court within 6 weeks from the day after the date of this letter for leave to bring a statutory review under section 288 of the TCPA 1990.

59. An applicant for any consent, agreement or approval required by a condition of this permission for agreement of reserved matters has a statutory right of appeal to the Secretary of State if consent, agreement or approval is refused or granted conditionally or

if the Local Planning Authority fails to give notice of its decision within the prescribed period.

60. A copy of this letter has been sent to South Cambridgeshire District Council and Cambridge Past Present and Future, and notification has been sent to others who asked to be informed of the decision.

Yours faithfully

Decision Officer

This decision was made by Minister of State for Housing, Planning and Building Safety, Lee Rowley MP, on behalf of the Secretary of State, and signed on his behalf

Annex A Schedule of representations

Representations received in response to the Secretary of State's letter of 8 March 2024

Party	Date
Greater Cambridge Shared Planning Service	22 March 2024
Mills & Reeve LLP on behalf of the appellant	22 March 2024

Annex B List of conditions

Conditions applicable to the Full Permission and Outline Permission

Phasing

Site Wide Phasing Plan

1. Prior to the commencement of any development, with the exception of below ground works, a Site Wide Phasing Plan shall be submitted to and approved in writing by the local planning authority. The Site Wide Phasing Plan shall include a mechanism for its review and amendment. The development shall be carried out in accordance with such approved details. References within this permission to a “phase” shall be to a phase as identified in the approved phasing plan.

Demolition Construction Environmental Management Plan (DCEMP)

2. Prior to the commencement of any development on any phase, a Demolition and Construction Environmental Management Plan (DCEMP) shall be submitted to and approved in writing by the local planning authority for that phase.

The DCEMP for a phase shall include the following in respect of that phase:

a) Proposed earthworks including method statement for the stripping of topsoil for reuse, the raising of land levels (if required) and arrangements for the temporary topsoil storage to BS3882:2007.

b) Archaeological protection and mitigation measures to be implemented during the construction process.

c) A traffic management plan including:

- contractor’s access arrangements for vehicles, plant and personnel including the location of construction traffic routes to and from the phase, details of their signing, monitoring and enforcement measures designed to require compliance with the approved routing arrangements;
- contractor parking including details and quantum of the proposed car parking and methods of preventing on street car parking; movements and control of muck away lorries;
- movements and control of all deliveries; and control of dust, mud and debris, in relationship to the operation of the adopted public highway.

d) Details of haul routes within the phase.

e) A plan specifying the area and siting of land to be provided for parking, turning, loading and unloading of all vehicles visiting the relevant parts of the site and siting of the contractor’s compound during the construction period to be agreed on a phased basis.

f) Collection and Delivery times for construction purposes. (Standard delivery and collection times during construction and demolition are between 0800 hours and 1800 hours on Monday – Friday and between 0800 hours and 1300 hours on Saturday and no collections or deliveries on Sundays or Bank and public holidays).

g) Dust management and wheel washing or other suitable mitigation measures such as lorry sheeting, including the consideration of construction / engineering related emissions to air, to

include dust and particulate monitoring and review and the use of low emissions vehicles and plant / equipment

h) Noise and vibration (including piling) impact / prediction assessment, monitoring and recording protocols / statements and consideration of mitigation measures in accordance with the provisions of BS5228 (2009): Code of practice for noise and vibration control on construction and open sites – Part 1 and 2 (or as superseded).

i) Details of best practice measures to be applied to prevent contamination of the water environment during construction.

j) Measures for soil handling.

k) Details of concrete crusher if required to be used on that phase.

l) Details of odour control systems used during construction including maintenance and manufacture specifications.

m) Maximum noise levels and appropriate mitigation for construction machinery, equipment, plant and vehicles.

n) Site lighting during construction.

o) Screening and hoarding details.

p) Access and protection arrangements around the site for pedestrians, cyclists and other road users.

q) Procedures for interference with public highways.

r) External safety and information signing notices.

s) Liaison, consultation and publicity arrangements, including dedicated points of contact.

t) Complaints procedures, including complaints response procedures

u) Membership of the considerate contractors' scheme.

v) The provision of safe walking and cycling routes through the construction site including the management of existing Public Rights of Way, as well as routes serving completed phases of the development.

w) A Construction Travel Plan setting out measures to encourage construction site operatives and construction site visitors to travel to and from the phase using sustainable means of transport.

x) Piling method statement detailing mitigation measures, where piling is proposed.

Development of each phase shall be carried out in accordance with the approved DCEMP for that phase.

Biodiversity

Construction Ecological Management Plan

3. Prior to the commencement of each phase of development, (including demolition, ground works, vegetation clearance) a Construction Ecological Management Plan (CEcMP) for that phase shall be submitted to and approved in writing by the local planning authority. The CEcMP for each phase shall include the following in respect of that phase:

a) Risk assessment of potentially damaging construction activities.

b) Identification of “biodiversity protection zones”.

c) Practical measures to avoid or reduce impacts during construction (both physical measures and sensitive working practices) in the form of method statements.

d) The location and timings of sensitive works to avoid harm to biodiversity features.

e) The times during construction when specialist ecologists need to be present on site to oversee works.

f) Responsible persons and lines of communication.

g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

h) Use of protective fences, exclusion barriers and warning signs if applicable.

The approved CEcMP for a phase shall be adhered to and implemented throughout the construction period of that phase strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Ecological Design Strategy

4. Prior to the commencement of each phase of development, with the exception of below ground works, an Ecological Design Strategy (EDS) for that phase addressing habitat creation, ecological enhancement, mitigation and compensation where appropriate, which shall be in accordance with the Greater Cambridge SuDS Supplementary Planning Document (2022) shall be submitted and approved in writing by the local planning authority.

The EDS shall include the following in connection with a phase:

a) The purpose and conservation objectives for the proposed works.

b) Review of site potential and constraints.

c) Detailed design(s) and/or working method(s) to achieve the stated objectives.

d) The extent and location/area of all proposed works on appropriate scale maps and plans.

e) Type and source of materials to be used where appropriate, e.g. native species of local provenance.

f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.

g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

h) Details of initial aftercare and long-term maintenance.

i) Details of monitoring and remedial measures.

j) Details for disposal of any wastes arising from the works.

The EDS for a phase shall be implemented in accordance with the approved details on that phase and thereafter all features shall be retained in that manner for the lifetime of the development.

Lighting Scheme

5. Prior to the commencement of each phase of development above ground, a lighting scheme for that phase shall be submitted to and approved in writing by the local planning authority. The scheme shall:

a) Include details of any external lighting within that phase such as street lighting, floodlighting, security lighting and an assessment of impact on any sensitive residential premises off site. The scheme for a phase shall include layout plans / elevations with luminaire locations annotated, full isolux contour map / diagrams showing the predicted illuminance in the horizontal and vertical plane (in lux) at critical locations within that phase, on the boundary of the that phase and at adjacent properties, hours and frequency of use, a schedule of equipment in the lighting design (luminaire type / profiles, mounting height, aiming angles / orientation, angle of glare, operational controls) and shall assess artificial light impact in accordance with the Institute of Lighting Professionals “Guidance Notes for the Reduction of Obtrusive Light GN01:2011”.

b) Identify those areas/features on that phase that are particularly sensitive for bats and which are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, e.g. for foraging; and

c) Show how and where any external lighting will be installed which clearly demonstrates that areas to be lit will not disturb or prevent bats from using their territory or having access to their breeding sites and resting places.

No external lighting within a phase shall be installed other than in accordance with the specifications and locations set out in the approved scheme for that phase, and shall be maintained thereafter in accordance with the scheme for the lifetime of the development.

Green Roofs

6. No above ground level development shall commence on any building until details of any biodiverse (green, blue or brown) roof(s) for that building have been submitted to and approved in writing by the local planning authority. Details of the green biodiverse roof(s) shall include means of access for maintenance purposes. Plans and sections showing the make-up of the sub-base to be used shall include the following:

a) Roofs will be biodiverse based with extensive substrate varying in depth from between 80-150mm.

b) Planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (the seed mix shall be focused on wildflower planting indigenous to the locality and shall contain no more than a maximum of 25% sedum (green roofs only)).

c) The biodiverse (green) roof shall not be used as an amenity facility nor sitting out space of any kind whatsoever and shall only be used otherwise as a biodiverse green roof in the case of essential maintenance or repair, or escape in case of emergency.

d) Where solar panels are proposed, bio-solar roofs shall be incorporated under and in between the panels. An array layout will be required incorporating a minimum of 0.75m between rows of panels for access and to ensure establishment of vegetation.

e) A management/maintenance plan.

All works to biodiverse roofs on a building shall be carried out in accordance with the approved details for that building prior to first occupation of that building and shall thereafter be maintained in accordance with the approved details for the lifetime of the development.

Contamination

Site Investigation

7. No development of any building or the Wild Park within a phase shall commence until:

a) The site for that building or the Wild Park has been subject to a detailed scheme for the investigation and recording of contamination and remediation objectives determined through a risk assessment and which has been agreed in writing by the local planning authority.

b) Detailed proposals for that building or the Wild Park for the removal, containment or otherwise rendering harmless of any contamination (the Remediation Method Statement) have been submitted to and approved in writing by the local planning authority.

Remediation

8. Prior to the first occupation of each building or the first use of the Wild Park within any phase of development, the works specified in any Remediation Method Statement detailed in Condition 7 for that building or the Wild Park must be completed and a verification report submitted to and approved in writing by the local planning authority.

Unidentified Contamination

9. If, during remediation or construction works, any additional or unexpected contamination (AUC) is identified, then: (1) works in the relevant phase shall cease until (2) remediation proposals for the AUC have been agreed in writing by the Local Planning Authority before any further works on the phase proceed and where such works relate to the construction of a building the remediation proposals shall be fully implemented prior to first occupation of that building hereby approved.

Transport

Future Management and Maintenance of Streets

10. Prior to the commencement of each phase of development, with the exception of below ground works, details of the proposed arrangements for future management and maintenance of the proposed streets under the control of the Applicant within that phase shall be submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details. Where streets are to be adopted, they shall be maintained in accordance with the approved management and maintenance details until such time as such streets are adopted.

Car and Cycle Parking

11. Prior to first occupation of any building within a phase, with the exception of below ground works, a Car and Cycle Parking Management Plan (CCPMP) for that phase shall be submitted to and approved in writing by, the local planning authority. The approved CCPMP for a phase shall include, but not necessarily be limited to, the following details:

a) how the car and cycle parking spaces will be allocated for each building including, where relevant, on-street parking;
b) confirmation that car and cycle parking provision for each building will be made available to occupants and maintained in operational condition for the lifetime of the development;
c) when the surface level car and cycle parking will be made available for use;
d) how the safety of users and access to the car and cycle parking areas within each building will be controlled and managed, including after hours use; and
e) the location and appearance of proposed security measures such as gates/shutters across the vehicle entrance/exit.

The development of each phase shall be carried out in accordance with the CCPMP for that phase and retained thereafter.

Landscape

Hard and Soft Landscape

12. Notwithstanding the approved plans, prior to the commencement of development above ground level for each phase, other than demolition, details of a hard and soft landscaping scheme for that phase shall be submitted to and approved in writing by the local planning authority. These details shall include:

a) existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines indicating lines, manholes, supports);

b) planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate and an implementation/planting programme;

c) boundary treatments (including gaps for hedgehogs) indicating the type, positions, design, and materials of boundary treatments to be erected.

d) the planting and establishment of structural landscaping to be provided in advance of all or specified parts of the site as appropriate.

e) details of all tree pits, including those in planters, hard paving and soft landscaped areas. All proposed underground services will be coordinated with the proposed tree planting.

All hard and soft landscape works within each phase shall be carried out and maintained in accordance with the approved landscaping details and programme for delivery for that phase. If within a period of ten years from the date of the planting, or replacement planting, any tree or plant is removed, uprooted or destroyed or dies, another tree or plant of the same species and size as that originally planted shall be planted at the same place as soon as is reasonably practicable.

Irrigation and Maintenance Scheme

13. Where the approved plans identify that trees are to be planted on a building plot then such building shall not be occupied until an irrigation and maintenance scheme for those trees has been submitted to and approved in writing by the local planning authority. From occupation of such building the approved irrigation and maintenance scheme shall be implemented and thereafter retained.

Sustainability

BREEAM Interim Design Stage Certification

14. Within six months of commencement of each building (excluding the residential buildings), or as soon as practicable after commencement of that building, a BRE issued Design Stage Certificate shall be submitted to, and approved in writing by, the local planning authority demonstrating that BREEAM 'excellent' as a minimum will be met for that building, with five credits for Wat 01 (water consumption). Where the Design Stage certificate for a building shows a shortfall in credits for BREEAM 'Excellent' accreditation, a statement shall also be submitted identifying how the shortfall for that building will be addressed to secure 'Excellent' accreditation. In the event that such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

BREEAM Post Construction Certification

15. Prior to the first use or occupation of each building (excluding the residential buildings) hereby approved, or within six months of first occupation of that building, a BRE issued post Construction Certificate shall be submitted to, and approved in writing by the local planning authority, indicating that the approved BREEAM rating has been met for that building. In the event that such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

Emission Ratings

16. No gas fired combustion appliances for any building within each phase shall be installed until details demonstrating the use of low Nitrogen Oxide (NOx) combustion boilers, (i.e., individual gas fired boilers that meet a dry NOx emission rating of ≤40mg/kWh) for that building have been submitted to and approved in writing by the local planning authority.

If the proposals include any gas fired Combined Heat and Power (CHP) System, the details shall demonstrate that the system meets the following emissions standards for various engine types:

• Spark ignition engine: less than or equal to 150 mg NOx/Nm^3

• Compression ignition engine: less than 400 mg NOx/Nm^3

• Gas turbine: less than 50 mg NOx/Nm^3

The details shall include a manufacturers Nitrogen Oxides (NOx) emission test certificate or other written evidence to demonstrate that every appliance installed meets the emissions standards above.

The approved appliances for each building shall be fully installed and operational before that building is occupied or the use of that building is commenced and retained as such.

Design

Materials

17. Prior to commencement of each phase of development above ground level, except for demolition, details of all the materials for the external surfaces of buildings to be used in the construction of the development for that phase shall be submitted to and approved in writing by the local planning authority. Only materials specified in the approved details shall be used on that phase of development.

Sample Panels

18. Prior to commencement of each phase of development above ground, except for demolition, sample palettes shall be available to view on site of all the external materials to be used on site for buildings within that phase. Sample palettes shall include sample panels of all bricks proposed to be used on site, together with sheeting material to be used for metal cladding and other materials to be used for fenestration. The brick panels shall be representative of the choice of bond, coursing, special brick patterning, mortar mix and pointing techniques. All details shall be submitted to and approved in writing by the local planning authority. The approved sample panels for a phase are to be retained on site for the duration of the work on that phase for comparative purposes. Works on a phase will take place only in accordance with approved details for that phase.

Drainage

Surface Water Drainage Design

19. No development above ground level on a phase shall commence until a detailed design of the surface water drainage for that phase, including a management and maintenance plan of surface water drainage within that phase, has been submitted to and approved in writing by the local planning authority. The design submitted shall distinguish between those parts of the system which are to be adopted by a statutory undertaker and those which are to remain under private ownership. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

The scheme shall be based upon the principles within the agreed:

• Flood Risk Assessment and Drainage Strategy, PJA Civil Engineering Ltd, Ref: 05425-R-03-C-FRA Rev C, Dated: 6 June 2022

• Technical Note, PJA Civil Engineering Ltd, Ref:05425 Version E, Dated: 17 April 2023

and shall also include:

a) Full results of the proposed drainage system modelling in the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;

b) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);

c) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections);

d) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupiers;

e) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems;

f) Full details of the maintenance/adoption of the surface water drainage system;

g) Permissions/consents to connect to a receiving watercourse or sewer;

h) CCTV survey and assessment of the downstream network to demonstrate sufficient capacity to receive additional volumes of surface water;

i) For the first Phase only, an investigation into downstream connectivity of the First Public Drain Overflow, via dye tracing, of the culverted section beneath the railway lines, adjoining the Site should be undertaken. A Summary Report, with accompanying photographs and plans, should be prepared and submitted to the local planning authority and shared with the Lead Local Flood Authority;

j) Measures taken to prevent pollution of the receiving groundwater and/or surface water.

The approved surface water drainage scheme for each phase of development shall be subsequently implemented in full accordance with the approved details prior to the first occupation of any part of the phase of development or in accordance with an implementation programme agreed in writing with the local planning authority and retained thereafter.

Surface Water Drainage (Construction Phase)

20. Prior to the commencement of each phase of development, details of measures indicating how additional surface water run-off from that phase will be avoided/mitigated during the construction works for that phase shall be submitted to and approved in writing by the local planning authority. The details for a phase shall include collection, balancing and/or settlement systems for these flows as required. The approved measures and systems for that phase or part thereof shall be brought into operation before any works to create buildings or hard surfaces commence on that phase or relevant part thereof.

System Survey & Report

21. Upon completion of the approved surface water drainage system for each phase, including any attenuation ponds, SuDs and swales, and prior to their adoption by a statutory undertaker or management company; a survey and report from an independent surveyor for that phase shall be submitted to and approved in writing by the local planning authority. The survey and report shall be carried out by an appropriately qualified Chartered Surveyor or Chartered Engineer and demonstrate that the surface water drainage system has been constructed in accordance with the approved details. Where any corrective/remedial works are necessary, details of those works with a timetable for their completion, shall be provided for approval in writing by the local planning authority. Any corrective/remedial works required for a phase shall be carried out in accordance with the approved details and timetable for that phase and subsequently re-surveyed by an appropriately qualified Chartered Surveyor or Chartered Engineer, with their findings submitted to and approved in writing by the local planning authority.

Foul Water

22. Prior to the commencement of each building within a phase of development above ground level a scheme for the provision and implementation of foul water drainage for that building shall be submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details prior to the first occupation of each building within a phase or in accordance with an implementation programme agreed in writing with the local planning authority.

Airport safety

Bird Hazard Management Plan

23. Prior to commencement of buildings within each phase of development above ground level, other than demolition, a Bird Hazard Management Plan for that phase shall be submitted to and approved in writing by the local planning authority. The submitted plan shall include details of the management of any flat/shallow pitched/green roofs on buildings within that phase which may be attractive to nesting, roosting and loafing birds.

The Bird Hazard Management Plan for a phase shall be implemented as approved and shall be managed in accordance with the Plan for the life of the buildings within that phase.

Glint and glare

24. Prior to the installation of any PV panels on the roof of any building, a Glint and Glare Assessment for the PV panels on that building shall be submitted to and approved in writing by the local planning authority. No PV panels shall be installed on a building other than in accordance with the approved details for that building.

Environmental Amenity

Noise (plant/equipment)

25. Prior to the commencement of each phase of development above ground level, a noise assessment and a scheme for the insulation of the building(s) and/or associated plant / equipment or other attenuation measures for each building, designed to minimise and mitigate the level of noise emanating from the building(s) and/or plant/equipment shall be submitted to and approved in writing by the local planning authority for that phase. The scheme for each building as approved shall be fully implemented before the first occupation of that building and shall thereafter be maintained in strict accordance with the approved details for the life of the development.

Odour – details of extraction

26. Prior to the first occupation of any building within each phase of development which is to contain a commercial kitchen, a scheme detailing plant, equipment and machinery used for the purposes of extraction, filtration and abatement of cooking odours for that building shall be submitted to and approved in writing by the local planning authority. The approved scheme for a building shall be installed and fully implemented before the first occupation of that building and shall thereafter be maintained in strict accordance with the approved details.

Height Limitations on Buildings and Structures

27. No building or other structure, whether temporary or permanent shall be permitted to be erected on the site at any time which exceeds 51 metres Above Mean Sea Level (AMSL).

Compliance with Environmental Statement

28. The development shall be carried out in accordance with the mitigation measures set out in Table 20.1 of the Environmental Statement (dated June 2022) and the following Technical Notes:

a) Technical Note by PJA Civil Engineering Ltd (Ref:05425 Version E dated 17 April 2023)

b) Technical Note by Temple Group Ltd (Ref:T6118 dated 20 April 2023)
c) Technical Note ECO00253 CN Phase 2 by RPS Consulting Services Ltd (RPS) dated 5 May 2023

Implementation of the Low Emissions Strategy

29. The development hereby approved shall be carried out in accordance with the Cambridge North Low Emission Strategy, PJA, August 2022 Version B. Prior to first occupation or use of any building hereby approved, a detailed implementation plan shall be submitted to and approved in writing by the local planning authority for that building. The implementation plan for a building shall show the location of electric vehicle charge points (at least 25% of the new car parking spaces to have electric charging points with passive provision for the remainder), capacity, charge rate, details of model, location of cabling and electric infrastructure drawings to include passive charge point provision for all remaining spaces connected to that building. The electric vehicle charge points for each building shall be installed within that building prior to first use of that buildings in accordance with the approved implementation plan and retained thereafter.

Hours of Works

30. No construction or demolition work shall be carried out and no plant or power operated machinery shall be operated in connection with the construction of the development other than between the following hours: 0800 hours and 1800 hours on Monday to Friday, 0800 hours and 1300 hours on Saturday and at no time on Sundays, Bank or Public Holidays.

Commercial Deliveries

31. Collection from and deliveries to any non-residential premises including those with retail, food or commercial uses shall only take place between the hours of 07.00 to 23.00 Monday to Saturday and 0900 to 1700 on Sunday, Bank and other Public Holidays.

Conditions applicable to that part of the application that was submitted in full with full details

Time Limit

32. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Approved Plans

33. The development hereby permitted shall be carried out in accordance with the approved documents, as listed at Schedule 1 of this decision, save for where such details are superseded by further details being submitted to and approved by the local planning authority pursuant to the conditions attached to this permission.

Change of Use Class E

34. Notwithstanding the provisions of Article 3 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that order with or without modification), the buildings S4, S6 and S7 shall only be used for office (Use Class E(g)(i)) and research and development (Use Class E(g)(ii)) uses above ground floor level and for no other use without the granting of a specific planning permission.

Change of Use Class E & F

35. Notwithstanding the provisions of Article 3 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that order with or without modification), the ground floor use of buildings S4, S5, S6 and S7 (other than those connected with the operation of the mobility hub) shall only be used for Class E (excluding Class E (g) (iii)) and Class F and for no other use without the granting of a specific planning permission.

Conditions applicable to that part of the application which was submitted in outline and without full details

Outline Permission (Reserved matters)

36. Prior to the commencement of each phase of development, details of the appearance, layout and scale, (hereinafter called the 'reserved matters') for that phase shall be submitted to and approved in writing by the local planning authority. The development of each phase shall be carried out as approved.

Time Limit

37. Application(s) for approval of the reserved matters for any phase in outline shall be made to the local planning authority before the expiration of five years from the date of this permission. The development of each outline phase shall commence before the expiration of three years from the date of approval of the last of the reserved matters of that phase to be approved.

38. The development hereby permitted shall be carried out in accordance with the approved documents as listed at Schedule 2 of this decision, save for where such details are superseded by further details being submitted to and approved by the local planning authority pursuant to the conditions attached to this permission.

Quantum of Development (compliance)

39. The development pursuant to the outline element of this permission of the uses listed below shall not exceed the following development levels:

a) three residential blocks providing up to 425 residential (Use Class C3) units.
b) up to 1,366sqm of flexible Class E and Class F floorspace (excluding Class E (g) (iii)) at ground floor level of the residential blocks.
c) two commercial buildings providing up to 22,538 sqm of Classes E(g) i(offices) and ii (research and development) floorspace (NIA).
d) up to 1,366 sqm of flexible Class E and Class F floorspace (NIA) (excluding Class E (g),(iii)) at ground floor level of the two commercial buildings.

Residential amenity

Internal Noise Levels

40. Each reserved matters application for a phase containing residential development pursuant to this outline permission shall include (for the written approval of the local planning authority) a noise assessment and noise attenuation / insulation scheme for such residential development (having regard to the building’s fabric, glazing and mechanical ventilation requirements) identifying measures to protect occupiers of that residential development from

traffic noise emanating from Milton Road, the A14, primary routes through the site, and the Cambridge Guided Busway, which shall be submitted to the local planning authority for approval.

The noise insulation scheme for a reserved matters application shall demonstrate that the external and internal noise levels recommended in British Standard 8233:1999 “Sound Insulation and noise reduction for buildings-Code of Practice” (or as superseded) can be reasonably achieved for the relevant part of the development and shall include a timescale for phased implementation of any recommended mitigation measure contained in the assessment.

The scheme for each part of the residential development within a phase or part thereof as approved shall be fully implemented prior to first occupation of that part of the residential development and shall thereafter be retained in perpetuity.

Housing Mix

41. Applications for reserved matters for a phase of development which contains residential units shall include the following details of housing mix:

a) A plan showing the location and distribution of market and affordable units (including tenure type)

b) Internal areas for each unit of accommodation; and

c) A schedule of dwelling sizes (by number of bedrooms).

Residential Space Standards

42. For each reserved matters application for a phase of development containing residential development pursuant to this outline permission details of the layout of the dwelling(s) as required by condition 36 above, shall demonstrate that all the dwelling(s) meet or exceed the Government's Technical Housing Standards - Nationally Described Space Standard (2015) or successor document.

M4(2) Units

43. At least 5% of all residential units within each reserved matters phase of development shall be designed to meet the accessible and adaptable dwellings M4 (2) standard of the Building Regulations 2010 (as amended) or successor document. A compliance statement shall be submitted with any reserved matters application for layout in relation to any phase of development or part thereof containing residential development pursuant to this outline permission to demonstrate the key principles have been achieved. In the event that such standards are replaced by an alternative national measure for building design applicable at the time of submission of any reserved matters application then the equivalent measures shall be applicable to the relevant part of the proposed development.

Lift access

44. Within any reserved matters application for a phase of development containing residential development pursuant to this outline permission details of any lifts proposed within the proposed residential building(s) shall be provided. The lifts shall be retained and maintained in a safe and operational condition for the lifetime of the building(s) which they serve.

Sustainability

Sustainability and Energy Statements

45. Each reserved matters application for a phase of development pursuant to this outline permission shall be accompanied by a Sustainability Statement setting out how the proposals meet the sustainability targets and commitments set out in the Cambridge North Sustainability Strategy, Hoare Lea, Revision 03 26 May 2022 as updated by (i) the Addendum to the Sustainability Strategy, Hoare Lea, Revision 1, 23 August 2022; (ii) the Cambridge North Energy Strategy, Hoare Lea, Issue 01 27 May 2022; and (iii) the Energy Strategy Addendum, Hilson Moran, 20 September 2022. Where the statement relates to part of the residential development, the statement shall also include details for the development of separate energy consumption targets for that part of the residential development within the phase of development.

The Sustainability Statement shall be subsequently implemented in full accordance with the approved details and maintained thereafter.

Water Conservation

46. Each reserved matters application for a phase of development pursuant to this outline permission which include a residential component shall be accompanied by a Water Conservation Strategy for the written approval of the local planning authority. The strategy shall include a water efficiency specification for each dwelling type, based on the Fitting Approach set out in Part G of the Building Regulations 2010 (2015 edition or any future successor) demonstrating that all dwellings (when considered as a whole) are able to achieve a typical design standard of water use of no more than 89 litres/person/day, as far as reasonably practicable. The approved strategy for a residential dwelling shall be subsequently implemented in full accordance with the approved details prior to first occupation of that residential dwelling and thereafter shall be retained.

Broadband provision (compliance)

47. No dwelling shall be first occupied until the necessary infrastructure to enable that dwelling to directly connect to and receive fibre optic broadband is installed and is capable of being fully operative.

Change of Use Class E & F (compliance)

48. Notwithstanding the provisions of Article 3 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that order with or without modification), the ground floor use of the commercial and residential buildings shall only be used for uses within Class C3, Class E (excluding Class E (g) (iii)) and/or Class F and for no other use. The exception to this is the community room to be provided in Building S13-S16 which shall be used for uses within Use Class F2(b) only and for no other for no other use.

SCHEDULE 1 – APPROVED PLANS FOR THE FULL APPLICATION

DRAWING REFERENCE	TITLE	DATE
Site-Wide - General		
239-ACME-PLA-S00-0010	Location Plan	June 2022
239-ACME-PLA-S00-0011	Site Plan	June 2022
Site-Wide Landscape Plans - Detail		
630_01(MP)001 P5	Landscape Masterplan	April 2023
630_01(MP)002 P3	Ecology Strategy Ground Floor	April 2023
630_01(MP)003 P1	Ecology Strategy Roof	June 2022
630_01(MP)004 P3	Public Open Space Provision	April 2023
630_01(MP)005 P2	Hard Landscape Strategy (West)	October 2022
630_01(MP)006 P2	Hard Landscape Strategy (East)	October 2022
630_01(MP)007 P2	Hard Landscape Strategy (Wild Park)	October 2022
630_01(MP)008 P2	Tree Strategy	October 2022
630_01(MP)009 P1	Planting Strategy (West)	June 2022
630_01(MP)010 P1	Planting Strategy (East)	June 2022
630_01(MP)011 P1	Levels and Drainage (West)	June 2022
630_01(MP)012 P1	Levels and Drainage (East)	June 2022
630_01(MP)013 P1	Levels and Drainage (Wild Park)	June 2022
630_01(MP)014 P3	Attenuation Strategy	April 2023
630_01(MP)015 P1	Furniture Strategy (West)	June 2022
630_01(MP)016 P1	Furniture Strategy (East)	June 2022
630_01(MP)017 P1	Furniture Strategy (Wild Park)	June 2022
630_01(MP)019 P1	Roof Strategy	June 2022
630_01(MP)020 P3	Tree Root Cell Extents	April 2023
630_01(MP)021 P2	Wild Park and Aggregates Yard Interface	October 2022
630_01(MP)022 P1	Cycle Strategy (West)	October 2022
630_01(MP)023 P1	Cycle Strategy (East)	October 2022
630_01(MP)024 P1	Proximity to Mineral Safeguarded areas	October 2022
630_01(MP)101 P1	Milton Avenue 1 of 2	June 2022
630_01(MP)102 P1	Milton Avenue 2 of 2	June 2022
630_01(MP)103 P2	Chesterton Way 1 of 3	October 2022
630_01(MP)104 P2	Chesterton Way 2 of 3	October 2022
630_01(MP)105 P2	Chesterton Way 3 of 3	October 2022
630_01(MP)106 P2	Cowley Road North	October 2022
630_01(MP)107 P2	Cowley Road East	October 2022
630_01(MP)108 P1	The Link	June 2022
630_01(MP)109 P2	Bramblefields Way	October 2022
630_01(MP)201 P2	1 Milton Avenue and Milton Walk	October 2022
630_01(MP)202 P2	Chesterton Square	October 2022
630_01(MP)203 P2	Station Row	October 2022
630_01(MP)204 P1	Station Row Features	June 2022
630_01(MP)205 P2	Piazza	October 2022
630_01(MP)206 P1	Station Row Passage	June 2022
630_01(MP)207 P1	Chesterton Passage	June 2022
630_01(MP)208 P1	Cowley Circus	June 2022
630_01(MP)209 P3	Wild Park	April 2023
630_01(MP)210 P2	Typical Meanwhile Use for Pocket Park	October 2022
630_01(MP)212 P1	Roof Garden – Labs	June 2022

630_01(MP)213 P1	Roof Garden – 1 Milton Avenue	June 2022
630_01(MP)301 P1	Residential Masterplan	June 2022
630_01(MP)304 P1	Play Areas – LEAP and LAP	June 2022
630_01(MP)305 P1	Play Areas – Natural Play	June 2022
630_01(MP)306 P1	Play Areas – Wild Park	June 2022
630_01(MP)307 P1	Residential Roof Garden Masterplan	June 2022
630_01(MP)308 P1	Roof Garden Features	June 2022
630_01(CD)001 P1	Typical Tree pit in hard landscaping	June 2022
630_01(CD)002 P1	Typical Tree pit in soft landscaping	June 2022
630_01(CD)003 P1	Typical Tree pit in raised planter over basement	June 2022
Site-Wide Highways Plans - Detail		
05425-C-2203-P2	Fire Tender Tracking (Sheet 1 of 2)	October 2022
05425-C-2204-P2	Fire Tender Tracking (Sheet 2 of 2)	October 2022
05425-C-2205-P1	Lab Servicing Access Swept Path Analysis Refuse Vehicle	June 2022
05425-C-2206-P2	Rigid Truck Tracking	October 2022
05425-C-2207-P1	Refuse Vehicle Tracking (Plan)	June 2022
05425-C-2208-P0	Whole Site Refuse Vehicle Tracking	October 2022
Building S04		
1781-MAKE-S04-PA1999 Rev 01	S4 Basement Plan	October 2022
1781-MAKE-S04-PA2000 Rev 01	S4 Ground Floor Plan	October 2022
1781-MAKE-S04-PA2001 Rev 01	S4 Level 01 Plan	October 2022
1781-MAKE-S04-PA2002 Rev 01	S4 Levels 02-04 Typical Plan	October 2022
1781-MAKE-S04-PA2005 Rev 01	S4 Level 05 Plan	October 2022
1781-MAKE-S04-PA2006 Rev 01	S4 Level 06 Plan	October 2022
1781-MAKE-S04-PA2007 Rev 01	S4 Level 07 Plan: Plant	October 2022
1781-MAKE-S04-PA2008 Rev 01)	S4 Roof Plan	October 2022
1781-MAKE-S04-PA2200	S4 Proposed East Elevation	June 2022
1781-MAKE-S04-PA2201	S4 Proposed South-East Elevation	June 2022
1781-MAKE-S04-PA2202	S4 Proposed South-West Elevation	June 2022
1781-MAKE-S04-PA2203	S4 Proposed North-West Elevation	June 2022
1781-MAKE-S04-PA2250 Rev 01	S4 Proposed Section AA and Section BB (Short and Long Section)	October 2022
Building S05		
239-ACME-PLA-S05-0100	S5 Location Plan	June 2022
239-ACME-PLA-S05-1100	S5 Ground Floor Plan	June 2022
239-ACME-PLA-S05-1101	S5 First Floor Plan	June 2022

239-ACME-PLA-S05-1102	S5 Second Floor Plan	June 2022
239-ACME-PLA-S05-1103	S5 Third Floor Plan	June 2022
239-ACME-PLA-S05-1104	S5 Fourth Floor Plan	June 2022
239-ACME-PLA-S05-1105	S5 Roof Plan	June 2022
239-ACME-PLA-S05-1110	S5 Basement Plan Acme	June 2022
239-ACME-PLA-S05-1200	S5 Mobility Hub Section	June 2022
239-ACME-PLA-S05-1300	Western And Eastern Elevations	June 2022
239-ACME-PLA-S05-1301	Northern And Southern Elevations	June 2022
Building S06 and S07		
1818-MAKE-S06-PA1949 Rev 01	S6 and S7 Combined Basement Plan	October 2022
1818-MAKE-S06-PA1950 Rev 02	S6 and S7 Combined Ground Floor Plan	October 2022
1818-MAKE-S06-PA1999 Rev 01	S6 Basement Plan	October 2022
1818-MAKE-S06-PA2000 Rev 02	S6 Ground Floor Plan	October 2022
1818-MAKE-S06-PA2001	S6 Levels 01-02 Typical Plan	June 2022
1818-MAKE-S06-PA2003	S6 Level 03 Plan	June 2022
1818-MAKE-S06-PA2004	S6 Level 04 Plan: Plant	June 2022
1818-MAKE-S06-PA2005	S6 Roof Plan	June 2022
1818-MAKE-S07-PA1999 Rev 01	S7 Basement Plan	October 2022
1818-MAKE-S07-PA2000 Rev 02	S7 Ground Floor Plan	October 2022
1818-MAKE-S07-PA2001	S7 Levels 01-02 Typical Plan	June 2022
1818-MAKE-S07-PA2003	S7 Level 03 Plan	June 2022
818-MAKE-S07-PA2004	S7 Level 04 Plan: Plant	June 2022
818-MAKE-S07-PA2005	S7 Roof Plan	June 2022
1818-MAKE-S06-PA2150 Rev 01	S6 and S7 Combined North-West Elevation	October 2022
1818-MAKE-S06-PA2151 Rev 01	S6 and S7 Combined South-East Elevation	October 2022
1818-MAKE-S06-PA2200 Rev 01	S6 Proposed North-West Elevation	October 2022
1818-MAKE-S06-PA2201	S6 Proposed North-East Elevation	June 2022
1818-MAKE-S06-PA2202 Rev 01	S6 Proposed South-East Elevation	October 2022

1818-MAKE-S06-PA2203	S6 Proposed South-West Elevation	June 2022
1818-MAKE-S06-PA2240	S6 and S7 Proposed Combined Section AA (Long Section)	June 2022
1818-MAKE-S06-PA2250	S6 Proposed Section BB and Section CC (Short and Long Section)	June 2022
1818-MAKE-S07-PA2200 Rev 01	S7 Proposed North-West Elevation	October 2022
1818-MAKE-S07-PA2201 Rev 01	S7 Proposed North-East Elevation	October 2022
1818-MAKE-S07-PA2202 Rev 01	S7 Proposed South-East Elevation	October 2022
1818-MAKE-S07-PA2203	S7 Proposed South-West Elevation	June 2022

SCHEDULE 2 – APPROVED PLANS FOR THE OUTLINE APPLICATION

Drawing reference	title	Date
239-ACME-PLA-S01-0101 Rev A	Existing Site Conditions	October 2022
239-ACME-PLA-S01-0102 Rev A	Building Layout and Application Type	October 2022
239-ACME-PLA-S01-0103 Rev A	Maximum Building Envelope – Basement	October 2022
239-ACME-PLA-S01-0104 Rev A	Maximum Building Envelope – Ground Floor Level	October 2022
239-ACME-PLA-S01-0105 Rev A	Maximum Building Envelope – Typical Level	October 2022
239-ACME-PLA-S01-0106 Rev A	Building Heights Plan	October 2022
239-ACME-PLA-S01-0107 Rev A	Proposed Uses – Ground Floor	October 2022
239-ACME-PLA-S01-0108 Rev A	Access Plan	October 2022
239-ACME-PLA-S01-0109 Rev A	Landscape and Open Spaces Plan	October 2022
239-ACME-PLA-S01-0300	Parameter Plans Area Schedule	June 2022

The Planning Inspectorate

Report to the Secretary of State

by Lesley Coffey BA(Hons) BTP MRTPI

an Inspector appointed by the Secretary of State

Date 25 January 2024

TOWN & COUNTRY PLANNING ACT 1990

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

APPEAL BY

BROOKGATE LAND LIMITED ON BEHALF OF THE CHESTERTON PARTNERSHIP

PROPOSED DEVELOPMENT AT LAND TO THE NORTH OF CAMBRIDGE NORTH STATION, CAMBRIDGE

Inquiry Opened on 6 June 2023

File Ref: APP/W0530/W/23/3315611

ABBREVIATIONS

AAP	Area Action Plan
AQMA	Air Quality Management Area
BNG	Biodiversity Net Gain
BtR	Build to Rent
CCC	Cambridge County Council
CCPMP	Car and Cycle Parking Management Plan
CGB	Cambridge Guided Busway
CMC	Case Management Conference
CEMP	Construction and Environmental Management Plan
CSP	Cambridge Science Park
CW	Cambridge Water
CWWTP	Cambridge Waste Water Treatment Plant
DAS	Design and Access Statement
DCEMP	Demolition and Construction Environmental Management Plan
DCO	Development Consent Order
EA	Environment Agency
EFI	Environmental Flow Indicators
ELEDS	Employment Land and Economic Development Study 2020
FDCA	Fen Ditton Conservation Area
GW	Groundwater
GWTE	Groundwater Dependant Terrestrial Habitats
HIA	North East Cambridgeshire Heritage Impact Assessment
IDP	Infrastructure Delivery Plan
LCA	Landscape Character Area
LCVIA	NEC Landscape Character and Visual Impact Appraisal
LVIA	Landscape and Visual Impact Appraisal
NE	Natural England
NECAAP	North East Cambridge Area Action Plan
NIA	Net Internal Area
NPPF	National Planning Policy Framework
OFWAT	Water Services Authority,
PPG	Planning Practice Guidance
RBMP	River Basin Management Plan
RSA	Restoring sustainable extraction
RSCCA	Riverside and Stourbridge Conservation Area

SCDC	South Cambridgeshire District Council
SCLP	South Cambridgeshire Local Plan
SEA	Strategic Environmental Assessment
SoCG	Statement of Common Ground
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage System
SWB	Surface Water Body
TA	Transport Assessment
TEP Report	North East Landscape Character and Visual Impact Appraisal – Development Scenarios
TP	Travel Plan
WFD	Water Framework Directive
WINEP	Water Industry National Environment Programme
WRE	Water Resources East
WISER	Water Industry Strategic Environmental Requirements
WMS	Written Ministerial Statement
WRMP	Water Resources Management Plan

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File Ref: APP/W0530/W/23/3315611

LAND TO THE NORTH OF CAMBRIDGE NORTH STATION, CAMBRIDGE

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
- The appeal is made by Brookgate Land Limited on behalf of the Chesterton Partnership against South Cambridgeshire District Council.
- The application Ref 22/02771/OUT is dated 14 June 2023.
- The development proposed is a hybrid application for:
  a) An outline application (all matters reserved apart from access and landscaping) for the construction of three new residential blocks providing up to 425 residential units and providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)); and two commercial buildings for Use Classes E(g) i (offices), ii (research and development) providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), together with the construction of basements for parking and building services, car and cycle parking and infrastructure works and demolition of existing structures.
  b) A full application for the construction of three commercial buildings for Use Classes E(g) i (offices) ii (research and development), providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), with associated car and cycle parking, a multi storey car and cycle park, together with the construction of basements for parking and building services, car and cycle parking and associated landscaping, infrastructure works and demolition of existing structures.

Summary of Recommendation: The appeal be allowed, and planning permission granted subject to conditions.

1 Introduction and Procedural Matters

1.1 The parties agreed a minor amendment to the description to better reflect the scale of the residential development proposed. The revised description is set out in the Statement of Common Ground (SoCG) dated 23 May 2023.[1] I find that the amended description more accurately reflects the nature of the proposed development and have used it above.

1.2 The Inquiry opened on 6 June 2023 and sat for 12 days. It was adjourned on 23 June 2023 in order to allow for additional modelling to be completed in relation to water neutrality issues and provide the parties with the opportunity to comment on the modelling. I carried out an accompanied site visit on 8 June 2023. I also carried out an unaccompanied site visit on 27 September.

1.3 The appeal was recovered by the Secretary of State on 24 March 2023 in exercise of his powers under section 79 and paragraph 3 of Schedule 6 of the Town and Country Planning Act 1990. The reason for this direction was that the appeal involved proposals for residential development of over 150 units or on a site of over 5 hectares, which would significantly impact on the Government's

[1] CD 6.11

objective to secure a better balance between housing demand and supply, as well as create high quality, sustainable, mixed and inclusive communities.

1.4 The application is a hybrid application. The outline application is for all matters to be reserved apart from access and landscaping. It comprises a Residential Quarter, which is proposed to accommodate up to 425 homes, and the Triangle Site, which is proposed to accommodate two commercial buildings with amenity provision at ground floor level.

1.5 The full planning application is for One Milton Avenue (building S04), a Mobility Hub (building S05) and One and Three Station Row (buildings S06 and S07). One Milton Avenue is a proposed office building with space for retail use at ground floor. The Mobility Hub would accommodate 725 car parking spaces. One and Three Station Row are laboratory buildings.

1.6 Cambridge Past Present and Future appeared as a Rule 6(6) party.

1.7 I held a Case Management Conference (CMC) on 11 April 2023. The procedure for the Inquiry and the timetable for the submission of documents were discussed at the meeting. The likely main issues and the Inquiry programme were also discussed.

1.8 Prior to the Inquiry I sought further comments from Natural England (NE) by letter dated 1 June 2023 in relation to water neutrality matters and other matters raised in its representations. A response to this note was received by the Inquiry on 16 June 2023.[2]

1.9 The Inquiry was adjourned on 23 June 2023 in order to allow for further work to be completed in relation to water neutrality. This information was received on 6 October 2023,[3] and the parties subsequently commented on it.[4] The Inquiry was closed in writing on 19 October 2023.

1.10 The Secretary of State published a revised National Planning Policy Framework and issued a Written Ministerial Statement on 19 December 2023. The parties were invited to comment on both. I have taken these comments, as well as the revised Framework and the Written Ministerial Statement into account in reaching my conclusions.

Planning Obligations

1.11 A draft agreement under Section 106 of the Town and Country Planning Act 1990 was submitted to the Inquiry. This was discussed at a roundtable session and a number of changes were agreed between the parties. An executed copy dated 13 July 2023 was submitted during the adjournment. The planning agreement addressed the provision of affordable housing, the Build to Rent accommodation, a range of contributions and community uses required by the District Council, the provision of Biodiversity Net Gain and open space, the provision of public art, the adoption of the guided busway, financial

[2] ID 1.10
[3] ID 1.33
[4] ID 1.34, ID 1.35

contributions to the County Council, education contributions, highway contributions and works, and covenants by the Council and County Council. I return to this matter at Section 11.

Putative Reasons for Refusal

1.12 The appeal is against the Council's failure to determine the application within the prescribed period. The Councils' Joint Development Control Committee on 22 March 2023 unanimously endorsed the 'minded to' refuse recommendation for the eight reasons included in the Officer's Report.[5]

1.13 In summary the reasons for refusal were:

> 1. The proposed development would not result in high quality development that delivers a well-designed place contributing positively to its surroundings. It would harm the surrounding landscape and Green Belt, particularly to the eastern edge of the site, and the adjacent urban areas and its relationship with the wider North East Cambridge Area, the City skyline and the landscape beyond. It would also have an overbearing presence on the existing development to the east of the development on Fen Road and to the west of the development, particularly on Discovery Way.
>
> 2. The effect on heritage assets, in particular the Fen Ditton and the Riverside and Stourbridge Common Conservation Areas, due to the height and massing, and siting of the buildings along the eastern edge.
>
> 3. The proposal fails to provide high quality public open space or a public realm which would result in a well-designed coherent sense of place that contributes to local distinctiveness. The proposal also fails to provide sufficient, convenient formal children's play space for residents. The shape and form of buildings within the outline application would result in potential incompatible building designs fronting streets and open spaces. Building S04 (One Milton Avenue) is overly large and bulky for its location.
>
> The proposed development through its over reliance on two tier cycle parking, together with the poor relationship of some cycle access points in relation to cycle way, fails to provide convenient and accessible provision for cycle parking and does not sufficiently promote active travel.
>
> 4. The application does not explain how the requirements of the development plan for comprehensive development of the area would be achieved in the absence of a comprehensive and appropriate S106 agreement.
>
> 5. The absence of planning obligations to mitigate the requirement for community infrastructure.

[5] CD 4.00 & CD 4.01 section 26

6. Insufficient information regarding climate change allowances used and to confirm that the proposed SuDS system has been designed to accommodate the lifetime of the development.

7. Insufficient information to adequately assess the ecological impact of the proposals, particularly in relation to bats.

8. Insufficient information within the noise report to demonstrate that the interaction between the proposed commercial use and the Aggregates Railhead (a Transport Infrastructure Area) would not prejudice the existing or future uses of the Transport Infrastructure Area.

1.14 Prior to the opening of the Inquiry the Council confirmed that there was sufficient technical information to address reasons for refusal 6, 7 and 8. In addition, the appellant and the County Council agreed a package of measures, including strategic highway contributions, which were agreed would address the fourth reason for refusal. Having reviewed the submitted evidence, I share this view, and have considered the appeal accordingly. Should the SoS wish to review the evidence in relation to these matters it can be found within the appendices to the updated Statement of Common Ground (Appendix 1 Flood Risk; Appendix 2 Safeguarded sites; Appendices 3 Technical Note in relation to biodiversity & 4).[6]

1.15 In addition to the putative reasons for refusal, the Environment Agency (EA) raised concerns regarding the effect of the proposal on water neutrality.[7]

1.16 The Government published an updated National Planning Policy Framework on 5 September 2023. The parties were not invited to comment on this since the substantive changes related to onshore windfarms and therefore were not relevant to the proposals.

1.17 The application was accompanied by an Environmental Statement (ES) prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.[8] In response to consultee and neighbour comments on the application, a suite of new and amended plans and documents was submitted.[9] The relevant updates to the ES in relation to this additional information are set out in an additional note.[10] I am satisfied that the ES was produced in accordance with the 2017 EIA Regulations, and the information produced has been taken into account in preparing this Report. All other environmental information submitted in connection with the appeal, including that arising from questioning at the Inquiry has also been taken into account.

[6] CD 6.11
[7] CD 13.00 – 13.08
[8] CD 1.17 – 1.58
[9] CD.2.00 – 2.91
[10] CD.2.00

2 The Appeal Site and Its Context[11]

2.1 The Site is located on the north-east edge of Cambridge within South Cambridgeshire District and immediately adjoins the administrative boundary of Cambridge City Council to the south-west. It is approximately 3km from the city centre. The Site benefits from access to a range of public transport services which connect the Site with Cambridge City Centre, local regional destinations and national destinations via the rail and bus network.

2.2 The Site extends to approximately 9.9 hectares (ha) and includes the existing surface level Cambridge North railway station car park, areas of hardstanding and areas of scrubland.

2.3 The Site is bound to the north by the remainder of the former Chesterton Sidings site, to the east by the railway line, to the south by the recently constructed 'One Cambridge Square' office building and 'Two Cambridge Square' Novotel hotel building. The Cambridge Guided Busway (CGB) and Cambridge Business Park lie to the west and north-west. Cambridge North railway station, which opened in 2017, is located adjacent to the Novotel.

Site Context

[11] A full description of the Site and its context is set out within the application documentation and officer report to the 22 March 2023 meeting of the Councils' Joint Development Control Committee, at paragraphs 2.1 to 2.7.

2.4 The existing vehicular access to the Site is from Cowley Road which links Milton Road to Cambridge North station. A shared footway/cycleway is segregated from the carriageway by an area of vegetation and the First Public Drain, an ordinary watercourse located to the north west of the Site. Within the Site, Milton Avenue has footways on both sides of the road and a segregated cycleway.

2.5 There is also pedestrian and cycle access to the Site from the CGB and from Moss Bank to the south.

2.6 The land between the railway lines and the River Cam is occupied by a low-rise development of caravan parks within the Green Belt and industrial units accessed from Fen Road. To the west of the Site is the Bramblefields Local Nature Reserve and residential development at Discovery Way.

2.7 The Cambridge Green Belt is separated from the Site by the railway line. Fen Ditton Conservation Area and the Riverside and Stourbridge Common Conservation Area are the closest heritage assets to the Site, with parts of their boundaries lying approximately 500m from the Site. Baits Bite Lock Conservation Area is located approximately 900m from the Site, with the Anglesey Abbey Registered Park and Garden approximately 5 kilometres away.

2.8 The application Site comes within the North East Cambridge Area Action Plan. (NECAAP). The first phase of development has taken place with the completion of the Cambridge North Rail station and Hotel. One Cambridge Square, the first office building of this initial phase is currently under construction.

2.9 Cambridge Waste Water Treatment Plant (CWWTP) and the aggregates railhead lie to the north. A Development Consent Order application (DCO) for the relocation of the CWWTP was accepted for examination in May 2023. The examination is due to close in April 2024. The site is in close proximity to further industrial and commercial uses, including the Cambridge Business Park and the Cambridge Science Park.

3 The Proposals

3.1 The proposals are intended to form the next phase of the Cambridge North redevelopment.

Outline Proposals

3.2 The outline application is for all matters to be reserved apart from access and landscaping. Parameter plans submitted with the application detail the proposed land uses, building heights, access and movement and open space and landscaping. The supporting Design and Access Statement (DAS) includes illustrative material which demonstrates how the proposal could be delivered within the proposed parameters. Drawings for the detailed matters, landscape and access, were submitted.

3.3 This proposal includes the Residential Quarter (S11-S12, S13-S16, S17-S21), which is proposed to accommodate up to 425 homes within three perimeter blocks. Unit sizes range from 1 bedroom to 3 bedroom homes. 155 of the homes would be open market and affordable units (within Block S13-S16). The remaining 270 homes would be Build to Rent units (BtR). Block S17-S21 and Block S11 − S12 are proposed to accommodate a number of amenities located at ground floor level, including a community room and cycle storage.

3.4 The Triangle Site is proposed to accommodate two commercial buildings (Use Class E (g) (i) /(ii)), referred to as One Chesterton Square (S09) and Two Milton Avenue (S08). Both buildings are proposed to accommodate office space, retail uses at food and beverage uses at ground floor level and a basement level to accommodate car parking, cycle parking, shower facilities and associated changing rooms and drying rooms, plant and storage.

3.5 The Building Height Parameter Plan identifies the maximum building heights permitted across the Site. Heights would range between 4 and 8 storeys (14m to 30m including plant). Lower heights are proposed to be located on the eastern edge of the Site along the railway edge and on the western edge of the Site with the tallest buildings to be located along Milton Avenue.

3.6 The Access Parameter Plan identifies the indicative alignments of the roads within the Site, together with the preferred alignment of the proposed cycle and pedestrian network. Means of access and detailed junction design are proposed as part of this application, including the Proposed Cowley Road/Milton Avenue Junction 'Cowley Circus' and the proposed Milton Avenue/The Link/Cowley Road East Junction.

3.7 The primary road of the Site would be the existing Cowley Road/Milton Avenue. The footway/cycleway on the western side are proposed to be switched from the current situation so that the cycleway is located closest to the carriageway to tie into the masterplan proposals. Additionally, space within the verges would be provided to accommodate disabled parking and loading bays.

3.8 Secondary roads would comprise a road from Cowley Road to the Cambridge North railway station car park (referred to in the masterplan as 'Cowley Road north'), a road along the eastern edge of the Site (referred to in the masterplan as 'Cowley Road east') and the existing link road from Cowley Road to the CGB (referred to in the masterplan as 'The Link'). The proposed tertiary streets are more compact in nature and enclose the Residential Quarter, with the existing CGB (referred to in the masterplan as 'Chesterton Way') forming the western edge of the site and a new street referred to in the masterplan as 'Bramblefields Way' forming the northern edge.

3.9 Details of landscaping is proposed as part of the application. The Landscape Masterplan demonstrates the location, quantum and function of green spaces within the Site. The phased construction of the development provides opportunities for '*meanwhile*' uses to provide temporary on-site activities during construction, including public open space, growing areas, art and allotments or such other temporary uses as may be agreed in accordance with the Meanwhile Uses Strategy. The Meanwhile Uses Strategy is secured by way of a planning obligation.

3.10 The proposed, permanent open spaces include:

● Chesterton Gardens – a central park within the Residential Quarter which comprises extensive tree planting, lawn mounds, sinuous paths, planting, play areas, pergolas and seating areas;
● Chesterton Square – a public square within the commercial quarter which comprises trees, water feature jets and 'sky mirror', raised beds, planting, seating, and a 'follow me' paving band;
● Station Row – a linear swale with ecologically diverse plantings, seating-steps and causeway crossings;
● Piazza – a pocket park at the termination of Station Row, with a wide path to One Milton Avenue and the Residential Quarter;
● Milton Way – a pocket park and passageway for cyclists, with spill-out space for office workers and residents. Raised planters would sit over basements, with integrated seating;
● Courtyards - overlooking a tree belt, to include seating and tree planting; and
● Wild Park – areas of retained open mosaic habitat and new open mosaic restoration, a balancing pond, a circular recreational walk and areas of natural play.

Full Proposals

3.11 The hybrid application includes a full application for One Milton Avenue (building S04), the Mobility Hub (building S05) and One and Three Station Row (buildings S06 and S07).

3.12 One Milton Avenue is a proposed office building. The building includes space for retail use at ground floor level, accessed via Milton Avenue. The building varies in height to a maximum of 7 storeys plus plant (30.83m). The building steps back to the north and west from level 5 upwards, offering amenity space to the building users. Buff stock brick is proposed with two tones of metallic panels. The lighter bronze finish is proposed to provide a contrast between the brick and the glazed areas, whilst the darker bronze finish is intended to highlight key architectural features.

3.13 The Mobility Hub is proposed to accommodate 725 car parking spaces across 5 levels. It would be between 14.15m and 15.81m in height, with the covered stairways on the northern and southern ends being 18.31m high. 622 of these spaces would be provided for rail users, re-providing the existing 428 surface car parking spaces, and accommodating a further 194 spaces for potential rail-related use should further growth in passenger demand occur in the future. The remaining 103 spaces would be provided at basement level of the mobility hub for the use of the commercial development.

3.14 The proposals seek to retain the flexibility to provide further parking for Network Rail. However, the time period over which passenger demand might grow, and hence trigger the potential need for additional spaces, is still uncertain.

3.15 The Mobility Hub also provides three flexible Class E use units at ground floor level on the western frontage of the building, facing onto Station Row. Vehicular access to the Mobility Hub would be via the new 'Cowley Road east' which would run along the eastern boundary of the Site. The Mobility Hub would feature folded metal panels on the western façade and perforated metal panels on the

eastern façade. The western façade includes a feature stair at the southwestern corner to signal the gateway leading towards the rest of the development. This elevation forms one of the main pedestrian flows from the station.

3.16 One and Three Station Row are laboratory buildings. They are 4 storeys in height, plus plant (up to 22.1m high). The building blocks step back to the east and west at level three, to provide amenity space for the building users. Flexible retail and other complementary ground floor uses are proposed at ground floor level. The retail uses seek to ensure an activated frontage to Station Row Passage. The side passages contain areas of public realm and visitor cycle parking. The design development of the façades revolves around the introduction of two grids. These articulate the alternating fingers, provide legible ground floor entrances, and define the recessed terraces.

4 Policy Context

The National Planning Policy Framework (The NPPF)

4.1 The NPPF is a material consideration in respect of this appeal. It confirms the presumption in favour of sustainable development. Sustainable development has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways.

4.2 The NPPF includes a number of policies relevant to the proposed development. These are discussed in more detail within my conclusions but include:

- Building a strong and competitive economy to help create the conditions in which businesses can invest, expand and adapt. The NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- Recognising the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries.
- Promoting sustainable transport including walking, cycling and public transport
- Focusing significant development on locations which are, or can be made, sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 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. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- Making effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- The creation of high quality, beautiful and sustainable buildings and places that will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

The Development Plan

4.3 The development plan includes the South Cambridgeshire Local Plan (2018) (SCLP) and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021).[12]

The South Cambridgeshire Local Plan

4.4 The Site forms part of the Major Development Site allocated under Policy SS/4 of the SCLP for the creation of a revitalised, employment focused area centred on a new transport interchange. It is intended to deliver high-quality mixed-use development, primarily for employment use, as well as a range of supporting uses, including commercial, retail, leisure and residential uses. The policy states that the amount of development, site capacity, viability time scales and phasing of development will be established through the preparation of an Area Action Plan (the NECAAP) to be developed jointly between South Cambridgeshire District Council and Cambridge City Council, and other stakeholders in the area. The majority of the NECAAP area is within Cambridge City Local Plan area, with Chesterton Sidings and part of the St John's Innovation Park within South Cambridgeshire.

4.5 Amongst other matters Policy SS/4 states that the development should not compromise opportunities for the redevelopment of the wider area. There is a similar policy (Policy 15) within the Cambridge Local Plan.[13]

4.6 Other relevant policies include:

- S/2: Objectives of the Local Plan
- S/3: Presumption in Favour of Sustainable Development
- S/5: Provision of New Jobs and Homes
- S/6: The Development Strategy to 2031
- SS/4: Cambridge Northern Fringe East and Cambridge North railway station
- CC/1: Mitigation and Adaption to Climate Change
- CC/3: Renewable and Low Carbon Energy in New Developments
- CC/4: Water Efficiency
- CC/6: Construction Methods
- CC/7: Water Quality
- CC/8: Sustainable Drainage Systems;
- CC/9: Managing Flood Risk
- HQ/1: Design Principles
- HQ/2: Public Art and New Development
- NH/2: Protecting and enhancing Landscape Character
- NH/4: Biodiversity
- NH/6: Green Infrastructure
- NH/8: Mitigating the Impact of Development in and Adjoining the Green Belt
- NH/14: Heritage Assets
- H/8: Housing Density

[12] CD 5.00 & CD 5.02
[13] CD.5.18

- H/9: Housing Mix
- H/10: Affordable Housing
- H/12: Residential Space Standards
- E/9: Promotion of Clusters
- E/10: Shared Social Spaces in Employment Areas
- E/22: Applications for New Retail Development
- SC/2: Health Impact Assessment
- SC/4: Meeting Community Needs
- SC/6: Indoor Community Facilities
- SC/7: Outdoor Play Space, Informal Open Space and New Development
- SC/9: Lighting Proposals
- SC/10: Noise Pollution
- SC/11: Contaminated Land
- SC/12: Air Pollution
- SC/14: Odour and Other Fugitive Emissions to Air
- TI/2: Planning for Sustainable Travel
- TI/3: Parking Provision
- TI/8: Infrastructure and New Developments
- TI/10: Broadband

4.7 The Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) identify the site as being within the Consultation Area for the Cambridge Northern Fringe Aggregates Railheads (Transport Infrastructure Area), the Cowley Road Waste Management Area (WMA), also known as the Cambridge Waste Transfer Station and the Cambridge Water Recycling Area (WRA). It is also a Sand and Gravel Mineral Safeguarding Area.

Emerging North East Cambridge Area Action Plan (NECAAP)

4.8 The Site falls within the boundary of the emerging NECAAP.[14] The NECAAP seeks to enhance the northern part of Cambridge for existing communities and help to meet the development needs of Greater Cambridge in a highly accessible location on a brownfield site. The strategic objectives include the creation of a vibrant mixed-use district and meeting the strategic needs of Cambridge and the sub-region. The NECAAP states that:

"*Creating a critical mass of activity in the area will help support a self-sustaining new city district and can reduce social inequality locally through the range of jobs and homes that are created. It can also help our response to climate change, by locating jobs and homes together, and where there are opportunities for travel by walking, cycling and public transport."*[15]

4.9 Work on the NECAAP began in 2013. The Draft NECAAP (regulation 18) was subject to public consultation between 27 July 2020 and 5 October 2020. There are outstanding objections, including those by the appellant , in respect of the emerging NECAAP, including in relation to the quantum, heights, density, scale and massing of development.

[14] CD 5.32
[15] CD 5.32 paragraph page 10

4.10 The Proposed Submission version of the emerging NECAAP (Regulation 19) was reported to the respective decision-making committees of SCDC and Cambridge City Council over December 2021 to January 2022 and was approved for public consultation. The NECAAP is predicated on the relocation of the CWWTP taking place and will not proceed to the Proposed Submission Stage (Regulation 19) unless and until the DCO has been approved. Consequently, the NECAAP process is currently paused and the consultation on the submission version has not taken place.

4.11 The appellant considers the NECAAP attracts very limited weight, whilst SCDC considers it attracts limited weight.[16] The evidence base that has informed the emerging plan includes a number of inconsistencies between the various documents. More significantly, the NECAAP is predicated on the relocation of the CWWTW to Green Belt land. This is subject to a considerable number of objections, including from the local community. Consequently, there is no certainty that Development Consent will be granted for the relocation of CWWTW. In the light of this, together with the early stage the NECAAP has reached, and the outstanding objections, I agree with the appellant, that the NECAAP and its evidence base should attract very limited weight.

The Emerging Greater Cambridge Local Plan

4.12 Together with Cambridge City Council, SCDC is preparing a joint Local Plan, known as the Greater Cambridge Joint Local Plan. The plan remains at an early stage. The parties agree that it attracts very limited weight in the context of this appeal since it remains at an early stage of preparation. I share this view.

Written Ministerial Statement (WMS) December 2023

4.13 The WMS specifically addresses the Government's vision for Cambridge. It includes plans for a new urban quarter adjacent to the existing city.

4.14 It announced a review of building regulations to allow local planning authorities to introduce tighter water efficiency standards in new homes. In states that:

> "*In the meantime, in areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance.*"

5 Matters Agreed

The Appellant and SCDC

5.1 The various SoCGs provide a description of the appeal site and the surrounding area, details of the proposed development and the agreed development plan

[16] CD 6.11 paragraph 8.12

policies.[17] The main SoCG also provides a summary of Statutory Consultee responses.

5.2 The matters agreed between the appellant and SCDC are set out in Section 5 of the main SoCG, the addendum to the SoCG, as well as the SoCG in respect of Design, Landscape and Heritage.[18] These include the relevant development plan and national planning policies.

5.3 The parties agree that the development proposal is primarily for employment use in accordance with Policy SS/4 of the SCLP. The residential development and housing mix proposed is acceptable in principle, in accordance with Policies SS/4 and H/9 of the SCLP. The provision of 40% affordable housing for the open market units, tenure mix, and 20% affordable private rent for the Build to Rent (BtR) units is agreed.

5.4 It is agreed that the Councils jointly have 6.5 years of housing land supply for the 2022-2027 five-year period using a 5% buffer.

5.5 The parties agree that the proposal would make a contribution to the public realm. It would also meet the space requirement for informal open space, informal children's play, formal equipped children's play and allotments.

Design

5.6 In terms of design the guiding principles for the masterplan vision are agreed.

5.7 The proportions and landscape treatment of Milton Avenue as well as the type and proportion of open space proposed is agreed. The parties also agree that the design of Chesterton Gardens is of high quality, well located and would provide a variety of uses and activities for the residents.

5.8 It is agreed that Building S04 has a role in providing a transition in scale between the consented One Cambridge Square and the proposed residential development.

5.9 It is agreed that Buildings S06 and S07 have been designed to ensure they create an attractive frontage onto all surrounding streets and spaces. The buildings are articulated through changes in heights, building line and materials which serve to create four bays that appear linked to create the urban block. The bays are successful in reducing the apparent massing and proportions of the building when viewed from relatively close up.

5.10 The varied materials palette for Buildings S06 and S07 serves to further emphasise the articulation of the blocks. The elevational design introduces a sense of depth and rhythm, and a finer grain / human scale to the buildings. The entrances are successfully articulated and would be easily recognised as the entrances. The elevation design successfully integrates the rooftop plant.

5.11 The height of the mobility hub varies between 14.2m and 15.8m. The provision of space for amenity and retail uses to activate the ground floor along Station

[17] CD 6.07,CD 6.08,CD 6.09, CD 6.10, CD 6.13 and CD 6.14
[18] CD 6.11, CD 6.7, CD 6.8, CD 6.9

Row is considered essential in making the introduction of a multi-storey car park in this location acceptable. The additional floor to floor heights allow for the future conversion into alternative uses and this is supported. The external architecture, including the external staircase, together with the design, colour and proposed materials work well to achieve a well-considered and high quality multi storey car park design.

5.12 The concept of framing Chesterton Square by Buildings S08 and S09 is also agreed.

5.13 The residential element is in outline and the floorplans are only illustrative at this stage. The residential provision is for up to 425 units. The parties agree that all residential units would have access to private external amenity space. Based on the illustrative floorplans, the proposal would provide 109 (25%) single aspect units. Of the single aspect units, 21 are north-west facing.

Landscape

5.14 Policy SS/4 envisages that the character of the appeal site would change, with the addition of mixed uses creating a vibrant, employment-focused area.

5.15 The appeal site is not within a landscape, or landscape-related designation, nor is it immediately adjacent to such designations. The River Cam valley includes the Riverside and Stourbridge Common Conservation Area, to the south of the appeal site, and the Fen Ditton Conservation Area to the east of the appeal site. The River Cam valley contains a number of public rights of way including Harcamlow Way, Fen Rivers Way, as well as National Cycle Routes 11 and 51 and a number of other footpaths.

5.16 Land to the east of the appeal site, and east of the railway line, is within Green Belt. This is a spatial planning designation and does not imply landscape value. The appeal site is not a valued landscape in the sense of NPPF paragraph 174(a).

5.17 The "Guidelines for Landscape and Visual Impact Assessment", 3rd Edition, (GLVIA3) provides best practice and widely accepted guidance on how to carry out landscape and visual assessments. The most up to date guidance on how to assess landscape value is within the Landscape Institute's Technical Guidance Note 02/21, "Assessing Landscape Value Outside of National Designations".

5.18 The visualisations prepared as part of the ES, and the methodology and landscape receptors used in the Bidwells LVIA are agreed by the Council as appropriate for assessing the townscape, landscape and visual effects of the proposed development.

5.19 The representative viewpoints set out in table 12.5 of the ES were agreed with South Cambridgeshire District Council's Landscape Officer following testing of visibility at a wider range of viewpoints. Although it was agreed at the time of drafting the ES that these viewpoints were suitable for assessing the visual effects of the proposed development, the Council no longer agrees this position.

5.20 Nonetheless, it was agreed that the proposed development would have negligible or no visual effects on any of the Strategic Viewpoints identified at

figure F.3 of the Cambridge Local Plan. The parties agree there would be no visual effects upon long distance viewpoints 10, P1, P4, P5 or P6.

Heritage

5.21 The Site does not contain any heritage assets. Fen Ditton Conservation Area and the Riverside and Stourbridge Common Conservation Area are the closest heritage assets to the Site, with parts of their boundaries lying approximately 500m from the Site. Anglesey Abbey Registered Park and Garden lies approximately 5km to the northeast. Baits Bite Lock Conservation Area is located to the north east of the Site, approximately 900m from the Site, with the Grade II* listed building Biggin Abbey located within it.

5.22 It is agreed by the main parties that the development proposals would cause "'less than substantial" harm to the significance of the Fen Ditton Conservation Area and the Riverside and Stourbridge Common Conservation Area, for the purposes of the NPPF.

Flood risk and drainage

5.23 Further information was provided by the appellant in the form of a Technical Note by PJA Civil Engineering Ltd, Ref:05425 Version E, Dated: 17 April 2023. It has been demonstrated that the drainage system can be designed to accommodate the full 40% uplift for climate change allowances in the 1% Annual Exceedance Probability storm. The increased attenuation areas can be accommodated within the Site.

5.24 It is therefore agreed the development is acceptable in respect of flood risk. Accordingly, SCDC withdrew reason for refusal 6.

Need and Economic Development

5.25 The Appeal Site is a specific site identified in Chapter 8 of the SCLP as an employment land allocation especially suited for cluster development – under Policy E/9.

5.26 The Employment Land and Economic Development Study 2020 (ELEDS) published in November 2020 confirms that the NECAAP submarket is key for Research & Development due to Cambridge Science Park.[19] The Appeal scheme is forecast to generate approximately 2,000 additional construction roles over the five-year construction period and approximately 4,300 additional on-site jobs after the Site is complete and the development fully operational.[20] It is agreed that the development would make a significant contribution to the local economy, especially as a proposal to support the knowledge-based Research and Development cluster in North East Cambridge.

5.27 The Greater Cambridge Employment and Housing Evidence Update (January 2023) confirms that demand for laboratory space has reached an all-time high with significant capital available for life sciences research but there is a severe

[19] CD 5.09
[20] CD 6,11 paragraph 8.28

shortage of available laboratory move-in space.[21] Immediately available space has fallen to almost zero against this background of high demand. The importance of the Life Science sector was recognised in the Government's Spring Budget 2023.

5.28 Mr Bryan and Mr Kinghan agree that the benchmark figure for average demand of new Net Internal Area (NIA) floorspace each year is 461,000 sq ft per annum to 2041. It is also agreed that there is almost no commercial lab space available at the present time.

Sustainable development

5.29 It is agreed that the Site is within a highly sustainable and accessible location. It is within easy walking distance of the railway station and bus interchange.

5.30 The development would deliver up to 425 new homes, which would help to maintain the Greater Cambridge five-year housing land supply and deliver affordable homes and include provision for community and retail facilities as well as open space. The proposal would generate positive economic impacts during the construction and operational phases of the development.

Safeguarded Sites

5.31 Further information was provided by the appellant in the form of a Technical Note T6118 by Temple Group Ltd dated 20 April 2023. It is agreed that sufficient information has now been submitted to demonstrate that the interaction between the proposed commercial use and the aggregates railhead would not prejudice the existing or future uses of the transport infrastructure area. Accordingly, the LPA withdrew reason for refusal 8.

5.32 The parties agree that, subject to appropriate conditions, there are no unacceptable impacts in terms of air quality, vibration and noise, odour, land contamination, lighting, human health, archaeology or utilities.

Benefits

5.33 It is agreed that there are number of economic, environmental and social benefits arising from the scheme.

5.34 The economic benefits include:

- The provision of 48,347 sqm (NIA) of Grade A office, lab and R&D floorspace in North East Cambridge;
- Supporting the Cambridge innovation and tech cluster;
- The provision of 2,000 additional construction roles over the five-year construction period;
- After the site is complete and the development is fully operational, the provision of approximately 4,300 on-site additional jobs.

5.35 The social benefits include:

[21] CD 5.10 paragraph 05 page 4

- The delivery of a significant number of new homes (up to 425 units), including 40% affordable housing on the open market units (up to 62 units) and 20% affordable private rent on the Build to Rent units (up to 54);
- Provision of new areas of public realm and open space;
- Provision of amenity and meanwhile uses, including community and retail provision;
- Provision of buildings with facilities integrated to promote health and wellbeing and the provision of walking and cycling infrastructure.

5.36 The environmental benefits include:

- Making use of previously developed land in an accessible and highly sustainable location;
- The delivery of a scheme with BREEAM 2018 Excellent certification as a minimum with an aspiration to target 'Outstanding' as the design develops;
- The delivery of an extensive increase in biodiversity across the Site;
- Provision of new areas of open space (2.211ha in total, of which 1.655ha is proposed or retained vegetation and at least 0.329ha is laid to permanent allotments/growing spaces);
- To facilitate a modal shift to non-car mode of transport, a wide range of measures are proposed to support public transport use and active travel.

The Appellant and CPPF

5.37 It is agreed that CPPF's concerns with the appeal scheme are limited to the impact of the proposed development on the landscape character and visual amenity of the area and on designated heritage assets, specifically Fen Ditton Conservation Area and the Riverside and Stourbridge Common Conservation Area. In respect of these issues, CPPF's position accords with that set out in Reason for Refusal 1 and Reason for Refusal 2 by the LPA.

5.38 The parties agree the relevant development plan and the weight to be afforded to the emerging plans. It is also agreed that the methodology, landscape receptors and representative viewpoints included within the LVIA were agreed between the appellant and the LPA in advance of the assessment being completed.

The Appellant and Cambridgeshire County Council[22]

Transport

5.39 The parties agree that the proposal occupies a highly sustainable and accessible location, and would offer a genuine choice of transport modes.

5.40 The methodology and extent of related surveys to assess the development impact by way of the Transport Assessment (TA) is agreed as a basis to understand and assess the proposals. The impact of the development on the

[22] CD 6.13

A14 has been agreed to be acceptable by National Highways, subject to a monitoring regime which will be secured in a Section 106 Agreement.

5.41 The level of car parking proposed for the development and the Railway Station is agreed and is within the car parking budget assigned to the Cambridge North allocation ('Chesterton Sidings' site) in the emerging NECAAP.

5.42 The level of cycle parking proposed would accord with SCLP Policies TI/2 and TI/3. The mix of Sheffield stands, double stacked spaces, parking for non-standard cycles and parking at street level for the commercial uses and the principles of the cycle parking provision for the residential use are agreed. The relationship of visitor cycle parking within the public realm to the proposed building entrances is agreed as being appropriate. Overall, it is agreed that the proposed cycle parking provision, and network of routes within the proposed development masterplan would encourage trips by active modes by future residents, employees and visitors to the proposed development.

5.43 The development proposes a suite of transport mitigation measures to encourage access to the site by sustainable modes of transport. These are secured by the s106 agreement. The parties agree that the development is not anticipated to result in an unacceptable impact on road safety, and that the residual cumulative impacts of the development on the road network are not anticipated to be severe.

5.44 The resulting transport strategies and mitigation measures have been specified and secured by way of planning conditions and a Section 106 Agreement. A sum of up to £4.5m has been agreed as an appropriate contribution. This sum comprises a financial contribution of up to £1.62m towards strategic transport measures, subject to a monitor and manage condition, £200,000 delivered as a financial contribution from the development, and measures amounting to £2,680,000 to be delivered by the developer. The split of the contribution is agreed.

5.45 There are no matters in dispute between the parties.

The Appellant and the Environment Agency[23]

5.46 The issues between the appellant and the Environment Agency centre on the availability of a sustainable water supply to support existing and proposed development within the Greater Cambridge Area.

5.47 The Water Services Authority (OFWAT) regulates the water industry on behalf of the Secretary of State and grants licences for water supply to water companies, including Cambridge Water (CW). The EA regulates the abstraction and impoundment of water to ensure that the water in England is abstracted sustainably.

5.48 The EA must exercise its functions so as to secure compliance with the requirements of the Water Framework Directive (WFD) including taking action

[23] CD6.12

to prevent deterioration in the status of water bodies. The EA must have regard to River Basin Management Plans (RBMP) in exercising their functions.

5.49 CW is responsible for developing and maintaining an efficient and economic system for providing secure and sustainable water supplies to consumers. It is required by statute to set out how it intends to balance supply and demand over a 25 year planning period through a Water Resources Management Plan (WRMP), updated every 5 years.

5.50 SCDC in exercising its plan-making functions have a legal requirement to prepare plans with the objective of contributing to achieving sustainable development.

Water Resource Management Plan

5.51 WRMPs are produced every 5 years and assess customer demands and available supplies over a 25-year planning period. The Water Resources Planning Guidelines require CW to set out how it intends to achieve a secure supply of water for its customers and protect and enhance the environment.

5.52 The existing WRMP was published in 2019. The draft 2024 plan was published for consultation on 24 February 2023, with a further draft published in September 2023.[24] The final draft WRMP will be reviewed and approved by the Secretary of State.

5.53 Each WRMP is supported by a Strategic Environmental Assessment (SEA). The SEA process includes the assessment of the likely significant effects, including cumulative effects, of the WRMP and its reasonable alternatives. The WRMP also identifies ways in which adverse effects can be avoided, minimised or mitigated and how any positive effects can be enhanced. A monitoring plan allows for the identification of any unforeseen environmental effects and implementation of remedial action where necessary.

Planning Policy

5.54 Paragraph 20(b) of the NPPF confirms that water supply is a strategic matter to be addressed through development plans and that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for infrastructure for water supply. Paragraph 174 (e) of the NPPF prevents new and existing development from contributing to, being put at an unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land stability. Development should where possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as RBMPs.

5.55 SCLP Local Policy CC/4 – Water Efficiency requires residential developments to achieve a minimum water efficiency equivalent to 110 litres per person per day. Proposals for non-residential development must be accompanied by a water

[24] ID 1.37

conservation strategy, which demonstrates a minimum water efficiency standard equivalent to the BREEAM standard of 2 credits for water use levels.

5.56 SCLP Local Policy CC/7 – Water Quality sets out requirements for all development proposals. These include an adequate water supply to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development. It is also required that the quality of water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality.

5.57 Both the EA and the appellant consider that CW is best placed to develop scenarios for the water availability for growth. It is also agreed that the standard of mitigation measures required for this planning application is a matter for the decision-maker. The EA recognises that the appellant, through the quantitative assessment, has demonstrated attempts to further reduce water use by proposing water efficiency and reuse measures exceeding current planning policy requirements of 110 litres per person per day.

5.58

6 The Case for the Brookgate Land Limited

6.1 This summary contains all material points in relation to the appellant's case and it is substantially based upon the closing submissions of the appellant. It is also taken from the evidence given on behalf of the appellant and from other documents submitted to the Inquiry and the appellant's response to the EA additional comments in relation to the EA review of the Cambridge Water Company scenario modelling.[25]

6.2 The appeal site lies close to Cambridge North station, which opened in 2017 as the result of a £50m investment of public funds. The Novotel Hotel and One Cambridge Square are both major commercial investments by Brookgate, the appellant company. The site is allocated brownfield land and is regarded by the Council as the most sustainable place in Cambridge to locate a mixed-use development.

6.3 The Council's case is that whilst the proposed uses are agreed to be in line with policy, the visual impact of the scheme is considered to be too great on landscape/visual and heritage receptors, and there were connected design issues with the scheme on site.

6.4 The Council agrees that the use of the appeal site should be optimised for the agreed uses. That means that to some extent the scheme would be visible from outside – principally from locations to the east of the River Cam and in some residential locations to the east and west of the site. It also acknowledges that its objectives for an urban quarter would not be met unless the scheme appears as an example of urbanism both within and from without the site.

6.5 Against that background, the impacts on landscape, visual receptors and the significance of two Conservation Areas would, in the view of the appellant, be small. The baseline of the Cam Valley and the two CAs include the noticeable presence of Cambridge's urban area already. The additional degree of urbanisation would cause limited harm.

Development Plan

6.6 The relevant part of the development plan is the 2018 Local Plan. This will be five years old later in 2023 but it is agreed to be up-to-date and (with one minor exception) fully compliant with the NPPF.

6.7 The emerging NECAAP is not relied on by the Council as a benchmark against which to test the proposals and the putative reasons for refusal do not refer to it. Similarly, very little weight can be given to the emerging Greater Cambridge Plan.

6.8 Reference is made by the Council to the documents produced as evidence leading to the draft NECAAP. There are a number of discrepancies between these documents, and this makes them very difficult to use as any form of

[25] ID1.35

touchstone. Moreover, the Council acknowledges that they have not been tested in any forum, or indeed put out for public consultation.

6.9 The intention is for North Cambridge to be a new quarter of Cambridge that is healthy, inclusive, walkable and low-carbon with a vibrant mix of science, workplaces, homes, services and social spaces. The aspiration is for the Appeal Site to become a steppingstone for the wider regeneration of North-East Cambridge.[26] This vision is supported by the recent WMS.

6.10 The vision for the site includes meeting the demand for laboratory space within Cambridge; the provision of housing; optimising the connectivity of the site by providing a low number of overall parking spaces for the office and residential use; providing a visually rich townscape; eliminating carbon-based heating and cooling and designing for electric mobility. The masterplan also sets out principles in respect of urban design, architectural design, sustainable design and accessibility. [27]

6.11 It is the appellant's view, that the hierarchy of the proposed streets would be clear and would meet legibility objectives as well as contribute to the sense of place in the scheme. The site is divided by the principal routes leading to and from the area close to the station.

6.12 Milton Avenue would be a much more spacious street than Station Row (only 16-18m wide). They would also differ in terms of traffic. Milton Avenue would be used by motorised vehicles, whilst Station Row would be limited to pedestrians and cyclists. The landscaping would also be different, with Milton Avenue characterised by large-scale boulevard type planting, and Station Row having a quite distinct feel due to the swale feature. These factors clearly distinguish the two routes and make Milton Avenue the major thoroughfare.

6.13 Cowley Road North (with its view eastwards towards the railway fence) would be easily recognised as a secondary route; the narrowness of Bramblefields Way, the approach to planting and the fact it would be one-way, makes it clear that it would also be a minor route. There would be a greater sense of openness at Cowley Circus pending the rest of the NECAAP development coming forward, but the final design of building S09 and the modest increase in height in residential building S20 would enclose it well.

6.14 There are good reasons for the segregation of the residential and commercial areas. The two uses can be difficult to combine in close proximity due to amenity issues. Splitting the residential into segments would have a detrimental effect on the provision of high-quality open space, play and other matters (such as combined rainwater harvesting and grey water recycling). Ms de Boom, on behalf of the Council, originally suggested that the residential accommodation might be put where building S07 is proposed. However, she recognised that locating a residential use adjacent to the railway and the presence of the aggregates area supports the location proposed by the appellant.

[26] CD 8.04d Section 5.1
[27] CD 8.04d Sections 5.4,5.5,5.6,5.7,5.8

6.15 It was also suggested that the residential uses might be put where buildings S08 or S09 are proposed to be, but this would potentially constrain the open space uses in the heart of the masterplan (particularly in Chesterton Square).

6.16 Throughout the commercial buildings, there is provision for active frontages with other uses, enlivening the public realm. The appellant considers the disposition of the uses through the scheme would be entirely appropriate and contribute to the creation of a sense of place.

6.17 The new urban quarter would include active evening uses at ground floor. These spaces would be popular not just with the residents of Chesterton Gardens, but with existing residents of the wider area who expressed a keen interest in on-site facilities during the consultation process. For much of the time the area would be busy. Over 750 residents are predicted to occupy Chesterton Gardens. There would also be more than 4,000 workers throughout the scheme, as well as those from the wider area, those staying at the hotel, those working in One Chesterton Square, and those going to and from the station.

6.18 The Council was also critical of the size of the floorplate of the laboratory buildings and office buildings. Large single-built-form blocks are characteristic of all types of urban area, including historic central Cambridge. The facades of the buildings are heavily articulated and would not appear to be overly large in scale or massive.

6.19 The Council did not criticise the spatial relationships within Chesterton Gardens, or between building S04 and the residential area, or between buildings S08 and S09. It was critical of the gaps between buildings on the eastern side. It considered that the appeal proposal would be a "*wall*" of development.

6.20 The gap between buildings S06 and S07 has been very carefully considered and provides some articulation inside the scheme, but also ensures appropriate enclosure to Chesterton Square on its eastern side where Station Road intersects with it. To widen them would have undesirable consequences for the internal spatial quality and functionality of the proposal.

6.21 The Council is also concerned that the quantum of development, in particular, the heights of S04, S06 and S07, and the taller residential blocks, as well as cumulative effects from these heights would be too great. However, the putative design reason for refusal does not refer to buildings S06 and S07 (part of the full application).

6.22 S06 and S07 are 4 commercial laboratory storeys in height. They are mid-rise buildings and are designed to step down from 22.1m maximum to just over 20m, 17.4m and 13.4 m. Their heights are not out of step with more modern buildings in such use in the wider NE Cambridge area. The character which the appeal proposals would create would reinforce the local distinctiveness with well-designed buildings.

6.23 Both buildings are designed to read well from the east and are articulated in plan and section. Ms de Boom accepted that the A-B-A-B rhythm, would be effective at breaking up the mass of the buildings when seen within and near the appeal site. Their building lines are not identical and the degree of

articulation and detail on Station Row provides a real sense of variety and interest in the view along the western facades of the two buildings. The balconies, overhangs and materials make a considerable difference to the appearance of the buildings (for instance the vertical strip of ventilation outlets incorporated into the pattern, the metallic lining of the side elevations, the differences between the bronze panelling on S06 compared with the silver shade used in its neighbour). They would be very high-quality buildings with all the qualities and benefits that integration brings.

6.24 Building S04, is organised to mediate between One Cambridge Square and Chesterton Gardens. It steps down from 30.84 m in height next to One Cambridge Square to 27.91m, then down to 19.95m towards the residential area.[28] That stepping is emphasized by changes to materials with the top level being darker, the top two occupied floors would be a little lighter and the parapet line at the top of the grid finished with much lighter stone. The parapet line would wrap around three sides, leaving only the chief corner on Milton Avenue with a fully expressed 7 storeys.[29] The design would make a satisfying transition from the similar height of One Cambridge Square on one side down to the Milton Walk to the north. Seen from ground level the designed archway on the corner of Milton Avenue and Milton Walk is another notable feature which aids that transition.

6.25 The architecture of building S04 mediates between the finer grain of the residential buildings on the one hand, and the more monumental treatment given to One Cambridge Square. It would be seen from Discovery Way across a distance of around 100m. Such views already contain One Cambridge Square, as well as a significant planted buffer on the western side of Chesterton Avenue. Although building S04 is significantly taller and bigger than the bungalows at the southern end of Discovery Way, there is such a distance between them that internal or external living conditions will not be detrimentally affected; nor would those of the three storey houses in that street.

6.26 Discovery Way is within the urban residential area and the resultant juxtaposition is not unexpected or harmful, given the baseline position, and the high quality of what would be seen of building S04. There is no sunlight/daylight impact on those properties. There would be no overlooking or loss of privacy issue. No one living in Discovery Way objected to the application, and only one letter of objection was sent on the appeal.

6.27 The layout created between Station Row and the edge of the railway is a contextual response to the need to sub-divide the area between Milton Avenue, which is effectively already in place, and the railway. It enables the functional objectives of well-designed office and laboratory buildings to be achieved whilst also creating well-proportioned and enclosed spaces between them, opening up the way through to the north and the wider NECAAP area in the future.

6.28 Ms de Boom suggested that wider gaps could be provided by re-orientating buildings S06 and S07 east-west. As she acknowledged, this would create a townscape in which there was no permeability north-south on this side of the

[28] CD 8.06 Figure 06 page 6
[29] CD 8.06 Figure 11 page 9, Figure 14 page 13

scheme, but instead two east-west streets both ending in the palisade fence to the railway. The result would be very poor in connectivity and layout terms and would harm the experience of Chesterton Square.

6.29 The creation of wider gaps between S06 and S07 would lose all purpose as soon as one were about 30 degrees off the axis of the grid or gaps – the effect would be a poorly articulated mass of oblique views, rather than a properly designed set of facades addressing the east. There would in fact only be a limited set of clear views of the appeal scheme from the east. Even if there were wider gaps between S06 and S07, as Ms de Boom's image 3 shows, even with wider gaps one would be able to capture few of the views.[30] The appellant considers this to be a further example of the Council's case not grappling with the challenges of masterplanning with anything like the necessary rigour.

6.30 The eastern elevation is designed as a principal elevation rather than a side or back. Buildings S06 and S07 were the subject of detailed iteration and assessment involving the testing of differing heights and articulation, as well as materiality options. The buildings are not set hard against the railway edge but are set back 16-18m from it. The planting scheme would filter the buildings with groups of trees of differing heights, rising to London Planes which would soften the views of the built form in longer distance views.

6.31 The buildings are articulated in section. Whilst distance will inevitably mean that not all of the details of the eastern elevation would be seen, a significant proportion would be effective at articulating the building even from the towpath/PROW by the River Cam. Views will also show the shadowing of the inset areas and the roads through into the scheme, and the bronze tone of the flank elevations may also be perceptible in the handful of relevant views.

6.32 It is therefore inaccurate to say that the perception, from the limited viewpoints to the east, would be of a "*wall*", or to allege that the transition to the distant countryside would be "*abrupt*". The site is too far away from those views, with too much existing and proposed intervening vegetation (and built form in some cases) to be abrupt. In some views the eastern elevations of buildings S06 and S07 will be visible, and in very few indeed could it properly be described as "*prominent*" – probably only Node viewpoint 21, but prominence is not the same as harm.

6.33 As Mr Ludewig's evidence states "*… a significant new urban quarter of Cambridge should not 'blend into' the neighbouring caravan park, allotments or Network Rail maintenance yard. It should stand as the beginning of a proud new city quarter. An extension for Cambridge through a whole new city quarter as envisaged in the AAP should be done with careful consideration but also with confidence, in the spirit of the traditional Cambridge townscape, which never sought to disappear, but created a varied set of facades defining a clear edge to the city.*"[31]

6.34 In some views, parts of buildings S04 and S09 will be visible over the top of S06-S07. The eye is able to discern that the layered effect is comprised of

[30] CD 9.04 page 21
[31] CD 8.04e Paragraph 6.6.5, page 79.

separate buildings. This is normal in an urban setting. More distant elements are different (S04) or can be different (the outline buildings) in materials from S06-S07, which would help the articulation of the overall urban form, and the effect would vary the skyline seen in some limited views from the east. This would be positive.

6.35 The northern part of the scheme includes the Wild Park that would provide recreation and play opportunities. Mr Myers, on behalf of the appellant, described the concept, which enables the space, and the open mosaic habitat (which is a valuable transitory habitat which is created and sustained by disturbance) to be incorporated into the scheme to aid the creation of a unique sense of place.

6.36 Building S09 would be designed to encourage ground floor connections with the Wild Park and would be close enough to provide a degree of surveillance of the southern areas of the Wild Park and it would be an attractive resource to those working in the building as well as others.

6.37 The main criticism was the distance (or perceived separation) of the Wild Park from Chesterton Gardens. The Wild Park is close to the residential use and does not involve crossing any busy roads or doing so without proper infrastructure (the crossing of Milton Avenue designed in a straight line to the Wild Park will be signal controlled). It would therefore be perceived as close by and readily accessible.

6.38 The Council made a number of other design criticisms that it described as "*non-fundamental*". It no longer objects to the cycle connectivity, or double height cycle racks.

6.39 There is ample flexibility to ensure a low proportion of single aspect apartments. The appellant's rebuttal evidence gave examples of how this can be done within the parameters, recognising that the final detailed scheme might well contain fewer units than the "*up to 425*" in the application as these details are worked out.[32]

6.40 The Council was critical of the character of Chesterton Way and the design/landscaping of that side of building S04. Chesterton Way is a major high speed cycle route and the route of the CGB. It has a very strong landscaped side to the west which will be improved. It does not have to be activated along its length and it is not poor design for there to be some service uses (the substation, the car lift, fire egress, etc) at the ground floor of S04 on this façade or for there not to be formal planting. The large windows into the "*end of trip*" cycle area at the ground floor of S04 would be quite active as one passes.

6.41 Whilst users, including future residents, may use Chesterton Way to get to the station by the quickest route, the main desire line for residents of Chesterton Gardens will be across Milton Walk and through the cut-through in building S04, designed to pick up on that route.

[32] CD 8.41 Appendix 3

6.42 Mr Wakefield, on behalf of the Council, suggested that the landscape design was "*generic*". The landscape design has been carefully considered. Mr Myers has sought to combine the layout of the spaces, the planting, the reuse of what little railway track lengths there are left on the site, the abstract reflection of tracks in paving to suggest the connections with the past. There is also a creative tension between the formality of the new urban quarter buildings and the rough planting that in places mimics the existing open mosaic habitat.

6.43 In conclusion, the scheme would be high quality design in line with HQ1 and the design part of SS/4 of the Local Plan and the guidance in both the NPPF and the National Design Guide. Given the aspirations for the creation of the area, the proposals would deliver a high quality new urban area. Great weight should be given to this benefit in the planning balance.

Landscape and Visual Effects

6.44 The relevant landscape character areas to consider for landscape impact are the River Cam Valley (Area 9A), area 6A (which includes Fen Ditton), and the residential area. The 'Cambridge skyline' is not an identifiable character area. Mr Smith, on behalf of the appellant, found the most recent Landscape Character Assessment by Chris Blandford Associates as the most useful and up to date character study, but regard should also be had to a limited degree to the NCA 88.[33]

6.45 The differences between SCDC and Mr Smith are agreed to be accurately summarised in Mr Smith's tables JSR2 and JSR3.[34] Mr Wakefield, on behalf of the Council, took no issue with the accuracy of the visualisations prepared, including the wire lines produced by Mr Smith. One difference between the parties is that Mr Wakefield focused on the worst case. This is not a true reflection of the guidance in GLVIA3 and tended to overstate the degree of landscape impact.

6.46 Views were agreed and tested as part of the iterative development of the scheme. These used accurate modelling of mass and height in Vu City and led to changes to built-form, landscaping and materials.

6.47 Mr Wakefield wished there to be a landscape buffer on the eastern edge. He criticised the scheme on the basis that it was not screened.

6.48 Mr Wakefield's methodology uses the "*high*" category of susceptibility to mean a landscape with a strong structure, a high degree of enclosure or intimacy, few detracting features, and of which typical examples might be of national, regional or local importance. The "*high*" category of magnitude in Mr Wakefield's methodology is said to mean "*total loss of key landscape characteristics*" and "*medium*" to mean "*moderate alteration to key landscape characteristics*".[35] He accepted that the scheme would cause no direct landscape impact, but just

[33] CD 5.28A & 5.28B
[34] CD 8.38A pages 18-22
[35] CD 9.10 Appendix 10

indirect effects on visual aspects of character caused by development outside the character areas.

6.49 The River Cam Valley is a valued landscape due to the river, and its social and recreational characteristics. Mr Smith gives it a sensitivity of high/medium, whereas Mr Wakefield gives it a "*high*" sensitivity rating. Mr Wakefield's judgement is based on a "high" susceptibility rating but does not reflect the characteristics of such a landscape within Mr Wakefield's appendices.[36]

6.50 It is a landscape characterised by the River Cam and surrounding floodplain meadows, all of which are heavily used by the residents of the urban area because the Cam corridor lies within and next to the City. The built form is a "*key characteristic*" of the character area, and a "*distinctive feature*" within it.

6.51 Mr Wakefield accepted that the Novotel and One Cambridge Square are incidents within the general key characteristic of visible urban edge. His position appeared to be that they increased, rather than decreased, the sensitivity of the landscape receptor. However, they are simply the first phase of the new urban quarter and are consistent with a key characteristic of this transitional landscape area. His reaction to the presence of science buildings in areas around the fringes of Cambridge was similar.

6.52 In the appellant's view, Mr Wakefield has pitched the sensitivity too high. He has also reached the wrong conclusion on magnitude of effect – "m*edium/high*". By his definition, "*high*" means "*total loss of key landscape characteristics*", and to label the indirect effects of the scheme, visible in relatively few distant views in any sense as "*high*" is an overstatement.

6.53 There also needs to be a judgement of the geographical extent of visual effects, and as to whether the views of the appeal proposals would change the relationship between the River Cam Corridor and the City. There would only be clusters of glimpsed distant views available from the character area, which already has, as a key characteristic, views of the urban edge since the site is within the rural/urban fringe. The geographical extent of the views would be limited because, even in winter, they would form a small part of the overall visual experience in the character area, and there would be no change in the relationship between City and landscape, just a relatively small change in degree to which one of the key characteristics would be visually present.

6.54 There would be no effect on the historic skyline of Cambridge. No important view would be harmed and there would be no breach of the City Council's Policy 60. The skyline in the vicinity of the site is variously made up of residential and commercial buildings, including the hotel and earlier offices on the Science Park. Mr Wakefield places too much weight on the views of St George's Church, Chesterton, nearly 2 kilometres from views on the east of the Cam. It is very hard to see it in the agreed or Node views, and if glimpsed, it plays an incidental role rather than being the focus for a more grandiose skyline. St Mary's Fen Ditton is barely visible even in winter and is not a view of Cambridge anyway.

[36] CD 9.10 page 43

6.55 There would be a change to the skyline where the appeal scheme would appear, but this would be "*moderate/neutral*" as assessed by Mr Smith.

6.56 Mr Wakefield says the effect on the residential area is "*moderate/major adverse*", but he focused on what he considered to be the worst case effect from the bungalow at the end of Discovery Way. Even that is an urban landscape characterised in the baseline condition by middle distance views of One Cambridge Square.

6.57 For much of the area, the appeal scheme would be invisible due to intervening built form. For streets like Fairham Road and Bourne Road, the appeal scheme would be visible next to One Cambridge Square which is prominent in those views. Much of Discovery Way features 3 storey townhouses which occlude the view of the site or feature much more prominently in the immediate views. Therefore Mr Smith's evidence as to a reasonably low level of landscape harm to the relevant receptors should clearly be preferred.

6.58 Turning to visual effects there is a large overlap with the landscape points.

6.59 Mr Wakefield's Node Viewpoint 19 (Fen Rivers PROW72) which lies some 1000-1100m from the site, is said to be of high sensitivity and to experience a high magnitude of change. The agreed wireline (CN-068) shows the view to be a glimpsed view through a gap in the hedge, not a continuous stretch of open view.[37] Even then, the size and scale of the appeal scheme as it appears in the view would be small. One is already aware of built forms in this view through the hedge and there is no defensible basis for a finding of a high magnitude of change, or a "significant deterioration".

6.60 Mr Wakefield's Node viewpoints 1-3 have a foreground dominated by the River Cam. In the middle distance one can see the development on Fen Road. In the distance, large urban structures can be made out. Mr Smith's wirelines show how limited the additional urbanisation would be.[38]

6.61 Mr Wakefield's viewpoint 21 would experience a significant change due to the clarity of the view and to be major/moderate adverse. However, it is a view which clearly features existing urban forms and would not change the fundamental relationship between the area next to the river enjoyed from the right of way, and the city edge on the horizon in the middle/long distance.

6.62 Mr Wakefield's viewpoints 22-23 are from a private viewpoint, at the Plough PH. The Council did not judge that this was a view that should be included in the LVIA for the application. Given that this is a private viewpoint the sensitivity is less than a properly public one. There would be a noticeable increase in degree of perception of the built form on the site from the pub garden, but there is already a clear perception of modern urban city buildings. In addition, the primary relationship, between the pub viewpoints and the Cam (including its recreational activities, and the towpath/fringe vegetation) would not be affected and would remain a dominant visual relationship. The "*high*" magnitude of change and "*major adverse*" impact suggested by Mr Wakefield equates on his

[37] CD 8.38a
[38] CD 8.38a CN056 & CN058

methodology to the highest possible magnitude of change to a view, and a "*significant deterioration*" in the view. Both are overstatements.

6.63 From Bidwells' viewpoint 6 and Node view 20 (above Green End in Fen Ditton), the Bidwells' LVIA finds a major adverse effect on this view. Mr Smith finds it to be medium adverse, due to the relatively small proportion of the view that would be affected.

6.64 It is of some note that where there are views, they all lie in the Green Belt, and yet the Council does not suggest that the visual openness of the Green Belt is affected at all. The overall level of landscape and visual harm due to the proposal is low. There would be a minor level of non-compliance with paragraph 174 of the NPPF in relation to the valued landscape, and a minor degree of non-compliance with local policies dealing with landscape and visual issues.

Heritage

6.65 The impacts on the Fen Ditton Conservation Area and the Riverside and Stourbridge Common Conservation Area are indirect visual effects arising from changes to their settings. Setting is not itself a heritage asset.

6.66 The Riverside and Stourbridge Conservation Area lies almost entirely in urban Cambridge. Only in its north easterly section (part of Ditton Meadows) does it contain some more rural elements, although there is no connection physically or visually with open countryside. There is an almost constant visual presence of the city edge throughout.

6.67 The significance of the Conservation Area lies partly in the history of Stourbridge Common and its medieval fairs, partly due to its relationship with Cambridge and the River Cam. The Conservation Area Appraisal notes the backcloth of trees through which the city can be seen.[39] There is some rurality, and it does contribute to significance, but it is attenuated by the use of the area for urban fringe recreation, almost municipal footpaths and bridges, and views of buildings.

6.68 The Council does not suggest any changes in views from Stourbridge Common. From the Ditton Meadows, there would be no prominent change in the views from near the river (Node views 1-3).[40] Dr Burgess, on behalf of the appellant ascribes the lowest level of less than substantial harm, to recognise that degree of change.

6.69 The Fen Ditton Conservation Area Appraisal sets out the significance of this Conservation Area, and this is largely agreed by the parties.[41]

(1) There is a clear focal point in the village: the group comprised of the Church, old Rectory, War Memorial and mature trees.

[39] CD 5.08
[40] CD 9.10
[41] CD 5.07

(2) The good buildings and fine townscape of the village, which are of exceptional quality.

(3) The relationship with the Cam – both visual across the meadow to the river, cultural (the Bumps course) and historic, bearing in mind the wharves and trade in the past.

(4) Some identified views through the built form to the river and the meadows on the east side of the river.

(5) The views of the urban fringe of Cambridge.

6.70 Mr Brady, on behalf of the Council, considered the Conservation Area as rural, rather than having a mix of characteristics, including a clear relationship with the City. It is neither wild nor particularly tranquil as suggested by Mr Brady. Mr Brady explained that his assessment of moderate less than substantial harm meant half-way between no harm and significant harm to the significance of the Conservation Area. Given that there would be no direct impact and most of what makes Fen Ditton special would not be affected at all, that seems to be an overstatement.

6.71 As agreed by Mr Brady, the effects on the Conservation Area would be limited to a clustered set of glimpsed distant views. He fairly accepted that where the urban edge appears clearly now, the change "*could be small*" in terms of the balance of city views and rurality.

6.72 The impact would be indirect and would preserve the distinction between the urban edge and the Conservation Area and would have very little impact on one's ability to understand and appreciate the significance of the Conservation Area. The very low level of harm stems from the fact that there would be a small change in degree of urbanisation in the views, rather than anything fundamental.

6.73 The appellant considers that the view expressed by Historic England is to be given limited weight. It is obviously not the case that the additional degree of urbanisation in a few views would "*profoundly change the character*" of the Conservation Area in Fen Ditton.[42]

6.74 Dr Burgess' overall view of degree of harm is to be preferred as much more aligned with the degree of change and the role of the rural/urban balance in Fen Ditton. His approach to the future of the NECAAP area is also right – it does not feature in his assessment of the particular harm that this scheme would cause, but it is reasonable to bear in mind as a material consideration that the site and wider area is intended to be a dense new city quarter, and there will be additional urbanisation to some degree come what may.

[42] ID 1.11

Comprehensiveness

6.75 The supporting text to Local Plan Policy SS4 indicates that schemes may come forward in advance of the AAP if they are acceptable on their merits and do not harm the wider comprehensive development of the NECAAP area. The Council (supported by the County Council) now agrees that the appeal scheme is acceptable in this regard due to the agreement over strategic transport contributions.

6.76 Mr Bodkin, for the owners of the core site (CWWTP and neighbouring land) expresses concern over what he sees as the undersupply of homes on the site, the amount of proposed BtR in the scheme and transport.

6.77 The appellant disagrees with Mr Bodkin's position for the following reasons:

(1) There is no policy stipulation about the number of homes to be built on the appeal site, or their tenure.

(2) Mr Bodkin refers to the numbers found in the AAP evidence base Typology documents, but no weight can be given to them, since they are not based on policy decisions about the disposition of uses and quanta across the NECAAP area and have not been the subject of testing.[43]

(3) The Core Site is years away from making its application(s) and perhaps 5 years away from producing a single house, on Mr Bodkin's evidence. He acknowledged the difficulty of attaching weight to a viability argument in circumstances where there is no scheme in existence, and no viability appraisal on which to form any such judgement.

(4) The agreed position is that the appeal scheme will be a catalyst for the rest of the AAP. It will physically join them up to the station, and provide a first-class mixed-use neighbourhood, packed with life (and Life Sciences).

Water Supply and Water Quality

6.78 It is agreed (between the appellant, the Council and the EA) that the appeal proposals comply with Policy CC/4 of the Local Plan. This sets a requirement for maximum water consumption per person of 110 litres per day, the proposals will comfortably exceed that target, at 89 litres per day for the residential units.[44] The WMS refers to, encourages local planning authorities to work with the EA and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance. The agreed conditions require the submission of a Water Conservation Strategy demonstrating a typical design standard of water use of no more than 89 litres/person/day as far as reasonably practicable.

6.79 The Council also confirms that the proposals would comply with Local Plan Policy CC/7. That policy relates to water quality and provides that "all development proposals must demonstrate" three things: (a) that there are adequate water

[43] CD 5.33
[44] CD 8.21B Appendix C quantitative assessment

and sewerage systems to service the development; (b) that "the quality of ground, surface or water bodies will not be harmed", and (c) that appropriate consideration is given to pollution.

6.80 There are no issues with either the first or third criteria. The Council is satisfied that the second criterion would be met since the policy applies to the effects of the development, rather than requiring any wider cumulative or strategic assessment. The EA's representation was that the policy encompassed much wider cumulative assessments of harm, but that is not how the Council reads it and must be incorrect as it would require developments to demonstrate no harm to water quality regardless of any causative link or indeed regardless of what actually might cause harm.

6.81 The EA 's objection comprises the following two main points:

- The current situation in the Cambridge Water area is an exception to the general principle that water supply issues are not matters for the determination of individual planning applications because there has been a material change in circumstances since the 2018 Local Plan.
- Based on its assessment of the evidence, the EA is not confident that Cambridge Water will be able (through its WRMP) to deliver a supply of water sufficient to meet the needs of Greater Cambridge without affecting the environmental quality of groundwater and therefore environmental quality of waterbodies.

6.82 Both the NPPF and the Planning Practice Guidance (PPG) state that supply of water and water quality are not normally matters for individual planning applications because they are of a strategic nature.[45] The PPG gives examples of exceptions to this principle, but none of these exceptions support the EA case.

6.83 The appeal proposals are for an allocated site and there is nothing exceptionally large about its water needs. There is no issue about physical works needed to connect to the water system. The EA's argument is that the last of these examples within PPG, equates to a much wider point about the EA's concerns in relation to Cambridge Water's draft WRMP 2024.

6.84 The EA has a statutory duty to consider and approve WRMPs in some form, possibly pursuant to a public inquiry. This represents the water regulatory system working as it should. The appellant contends that the EA's basic point is that it is not yet satisfied with the draft WRMP and this demonstrates that the issue is one for the water regulation system and not for the determination of planning applications or appeals.

6.85 The EA objection is not founded on sound evidence to indicate that the appeal proposals would give rise to a risk of harm to water bodies or their environments, or that there is a link between falling water quality and abstraction by Cambridge Water.

6.86 The EA data to support either of these propositions comprises the summary tables described as "*Outcomes from WFD Hydrological Regime Investigations*"

[45] NPPF paragraph 20: PPG Paragraph ID 34-016-20140306.

and the modelling outputs aimed at estimating the ecological status of waterbodies in three scenarios (historical, naturalised and fully licensed).[46]

6.87 The summary tables are incomplete in relation to various element classifications. Much more significantly though, there is no specific observed pattern of decline in the hydrological regime. The only published assessment based on empirical data does not show a downward decline in hydrological regime, let alone one which is observably tied to the effects of groundwater abstraction by water companies.

6.88 Mr Page, on behalf of the EA, said that the key indicator for detrimental effects caused by water abstraction was the effect on invertebrates. But in the three waterbodies where it is claimed abstraction is causing hydrological regime harm, there is no pattern showing a decline in invertebrates. The Granta has invertebrate criterion results from "*Good*" rising to "*High*". Mr Page said that an update for 2022 showed "Good" again, but that is not a pattern of decline. The River Cam (Audley End to Stapleford) records the uniform result "*High*" from 2013 to 2019. The Cam (Stapleford to Hauxton Junction) is the same. None of these three, which are the main waterbodies "*where abstraction (including that from CW) is currently a contributing factor to ecological pressure*" shows any overall downward trend beyond the key invertebrate indicator.

6.89 The results rely on a model which cannot have been validated against trends of downward hydrological indicators, because there are no such trends. The invertebrate (and other indicators) in the summary data tables for those waterbodies show no downward trends (in relation to invertebrates or in general biological quality elements) at all. There are no data on declining flows (no gauge data is provided), and no evidence on monitored levels of groundwater declining.

6.90 There is no evidence presented by the EA which shows direct impact from any abstraction points, or evidence that shows that stopping or reducing abstraction would increase surface water flows and mitigate deterioration of ecology. Indeed, if there were evidence of a decline, it may be due to other factors such as effluent discharge, agricultural run-off, or climate change.

6.91 The evidence currently available is not able to support the proposition that Cambridge Water abstraction is causing, or will cause, material harm to the ecology of the waterbodies concerned. It would be disproportionate on the basis of this evidence to effectively call a halt to much needed development around Cambridge whilst the relevant statutory bodies analyse whether there is actually an issue specifically related to water abstraction.

6.92 Statutory processes are already in place and will continue to work over the coming years. This is a principle long recognised by the Courts.[47] A challenge was made to the DCO consenting process for Hinkley Point C new nuclear power station. Upholding the consenting process, the Court of Appeal concluded that the Secretary of State was entitled to have regard to the statutory regime which dealt with design and safety issues. On the facts of that case, it was observed

[46] CD13.1
[47] ID *R(An Taisce) v SSECC[2014]* EWCA Civ1111 paragraphs 46-51

that it was almost the paradigm case where such regard would be appropriate, but the instant case is equally clear. The EA and Cambridge Water are required to undertake a statutory process which ends with the adoption of a WRMP in 2024. That is how Parliament has decided that strategic water supply and quality issues are to be dealt with, and the WRMP feeds into the production of strategic plans for the area in the form of the forthcoming Greater Cambridge Plan and the NECAAP.

6.93 The EA has already made 12 recommendations and 7 improvements to the February versions of the draft WRMP 2024, and the water company is due to make a formal response to these by the end of August 2023.

6.94 CW currently operate a complex network which balances abstraction across the entirety of the network. As such, it is not possible to determine the exact nature and/or extent of deterioration of a specific water body as a result of a specific development. As an allocated site within SCLP, the associated supply and demand of the development proposals have been allowed for within CW's WRMP19 and recently published dWRMP24. The WRMP 19 assumes that dwellings are built to a standard of 125 l/p/d.

6.95 There is no evidence that the very small effect that the appeal proposals would have on increasing the need for water will affect either supply or quality or that the point has not been treated properly in the ES. The scheme would, with its water efficiency measures in place, amount to just 0.22% of the total Cambridge Water demand. Without any measures in an adopted WRMP, the residential part of the scheme would represent just 1.6% of the total residential demand – but it is unrealistic to assume that there would be no measures in place.

6.96 The Water Industry Strategic Environmental Requirements (WISER) are written by the EA and NE. They set out expectations on the water companies for overall environmental performance, and that influences the content of the Water Industry National Environmental Programme ("WINEP"), a programme on a 5 yearly cycle synchronised with the production of WRMPs. We have not been provided with the WINEP contents for Cambridge Water but we do know from the EA that WINEP measures have been implemented for 2025 on the Cam, Rhee and Granta, and there will be more WINEP measures in the next cycle.

6.97 This is a further element of the statutory process in action at the strategic level. Whilst the EA may put pressure on Cambridge Water and other public bodies by objecting to large planning applications (though not, one notes, to small ones), to give those objections anything more than limited weight would be to run counter to the structure of the water industry regulation and the clear guidance in the PPG.

6.98 There is no evidence to suggest that the scheme would be supplied from just one abstraction point; indeed the reverse seems to be the case, ie that one cannot tell the source or sources of the scheme's water supply.

6.99 There has been no objection to the adequacy of the submitted ES, from the Council or from the EA. The EA's suggestion that the scheme needs to be tested against the cumulative scenario including an unspecified amount of development which is neither "existing or approved" (or even identified in a

draft plan), is contrary to the requirements of the EIA Regulations. That kind of strategic cumulative scenario testing is for the WRMP process and is under way.

6.100 For these reasons, the Inspector and Secretary of State should not give more than limited weight to the EA's objection.

6.101 NE rely on the evidence from the EA to found concerns about possible risk to Sites of Special Scientific Interest (SSSIs) in the area. The defects in that evidence remove any force from the NE points as well. There is no evidence that any SSSI would be harmed by the scheme on its own; indeed, there is no evidence that the SSSIs would be harmed by water abstraction either.

6.102 As explained, there is also no issue arising in relation to any Natura 2000 designated European sites. Although the AAP process scoped Wicken Fen into the Habitats Regulations Assessment on a purely precautionary basis and despite the empirical evidence, the conclusion was that the AAP would not have an effect on the Wicken Fen, since the competent authority can rely on the WRMP in relation to groundwater supply, and Local Plan water efficiency measures.

6.103 As discussed at the conditions session, there is no need in these circumstances for a condition which restricts residential development until the WRMP is agreed, but if the Inspector or Secretary of State judge differently, wording for such a condition has been suggested.

6.104 In relation to the additional modelling the appellant notes that the results have not been shared with the appellant, and the only information is at Table 1 of the EA letter.[48]

6.105 No new material evidence has been put forward in the EA's representation and the appellant stands by its case on the water supply and quality issue as summarised in the closing submissions.[49] The EA acknowledges the limitations in its work. Its comments are "without prejudice" to a detailed assessment, and not "conclusive". For this reason alone, little weight can be given to the EA letter.

6.106 The EA references future growth but fails to attribute a meaning to this. Irrespective of whether this is referencing all potential growth during the period of the next WRMP, over the next 25 years, all future growth identified in the existing Local Plan or all future growth proposed in the emerging combined Greater Cambridge Local Plan, this is simply not the correct assessment criteria for this s.78 Appeal. Again, this simply highlights that the discussions between CW and EA are much wider than the appeal scheme and the assessments are based on the separate regulatory processes.

6.107 The LPA maintains its position of not raising an objection in relation to water resources; is of the view that the issue of water stress has been appropriately considered in respect of this development proposal by applying the relevant

[48] ID 1.36
[49] ID 1.29 paragraphs 97-120

Local Plan policies; and considers that an appropriate package of mitigation has been secured.[50]

6.108 The appellant does not consider the additional mitigation items listed on page 4 of the LPA's Response (delaying occupation or linking the development to strategic water supply intervention) to be necessary or justified.

Weight to be given to the benefits

6.109 There is agreement with SCDC on seven (or eight) of the twelve benefits of the scheme.[51] SCDC agrees that great weight should be given to the sustainable location and the scheme's response to the climate emergency. Considerable weight to the contribution to the cluster effect that the scheme would make, the very considerable new employment (over 4,300 jobs), to housing need (up to 425 units), to affordable housing needs (40% in general and 20% of the BtR), and response to biodiversity given the Biodiversity Net Gain (BNG) improvement it would bring is also agreed, as well as moderate weight to the amenity and meanwhile uses.

6.110 Ms Bradley, on behalf of the Council conceded that the scheme would reuse previously developed land, something which paragraph 120 of the NPPF suggests carries substantial weight.

6.111 Ms Bradley affords the public realm and open space uses limited weight in her proof of evidence, but she acknowledged that she ought to have reached a positive view about Chesterton Square and the Piazza as well as Chesterton Gardens. That simply leaves the point about the perceived separation of the Wild Park from the residential units.

6.112 Wellbeing and social inclusion: Ms Bradley's reasons for giving limited weight to the facilities available that might encourage well-being and cohesion are very limited – the lack of outdoor space for collaboration and recreation. The labs and offices are replete with design aimed at wellbeing and social/business collaboration (balconies, terraces, activation spaces, restaurant and café spaces); the scheme has at least four well designed external spaces for sitting, talking and recreation.

6.113 Major companies like Samsung and Microsoft have moved from campuses on the edge of Cambridge to the appellant 's successful CB1 development adjacent to the main city railway station. This is not just for the benefits to staff of being near the centre, but also for being in a centre with a cluster of different potential employers. There is simply no comparison between the way this development would facilitate that kind of beneficial interaction and any of the edge-of-Cambridge parks, even Cambridge Biomed. Mr Derbyshire is right to give wellbeing and social inclusion moderate weight.

[50] ID1.35
[51] CD 6.11 page 45 Table 4

6.114 Mr Derbyshire gives the proposed architecture in the scheme great weight, whereas the Council give it moderate weight.[52] Ms Bradley's ascription of moderate weight (even taking into account Ms de Boom's design criticism) is inconsistent with her giving considerable negative weight to design as well. The alleged harm comprises a wholly separate harm to which a lot of weight is then given. That is to double count the harm and is also inconsistent in terms of overall weight to be given.

6.115 Mr Derbyshire considers that great weight should be given to meeting the need for office, Labs and R&D space. He rightly questioned the basis on which the Council refuse to recognise it, despite the Local Plan and the recognition by a "*pro-growth authority*" of the huge importance of such space and the enormous shortfall. On behalf of the Council, Ms Bradley stated that the site "*is not critical*" to meeting the need for this kind of space and therefore should be accorded only "*considerable weight*".

6.116 It makes little sense to say that the site or scheme is of less weight because it is "*not critical*" when:

(1) There is no local or national policy cap on the amount of weight to be given to this kind of commercial science and office space. Paragraphs 81 and 83 of the NPPF strongly support meeting the demands of the market.

(2) The need is not just a Cambridge or regional need, it is genuinely of national importance to the economic prosperity of the UK.

(3) The Council's witness, Mr Kinghan, agreed that the labs and office space proposed here will let when it is available. That concession is of considerable importance, because it goes to the heart of whether the site and scheme will be needed when they are delivered, between 2026 and 2028.

(4) Mr Bryan is absolutely clear that the space will all be let, indeed it will be highly sought after by the kind of tenants who have space at CB1 (as Mr Derbyshire said, they include Apple, Amazon and Microsoft, three of the world's four trillion-dollar companies).

(5) In any event, as Ms Bradley accepted, if the appeal site is not critical, then in principle no site in Cambridge is. It is better to acknowledge that there is a huge demand for these facilities, and they should all be supported in principle with the maximum weight to this benefit.

(6) The site is in the Council's own opinion, the best site for such uses to go in sustainability terms; it is top of the notional pecking order that Mr Derbyshire spoke about. It makes little sense to declare that this site should be given less weight than sites which are not as sustainable, nor as desirable by the market due to the level of connection and connectivity that they would provide.

[52] The reference to high quality infrastructure in table 4 should read 'high quality architecture.'

6.117 Great weight should be afforded to the way the scheme would meet some of the needs of the knowledge economy in Cambridge. There is currently a huge shortfall and high need that will not have evaporated by the time the appeal scheme is delivered.

(1) The average demand of new NIA floorspace each year between now and 2028/29 is between 461,000 sq ft per annum to 2041 and 536,000 sq ft per annum.

(2) There is no dispute that as at 2023, there is almost no commercial lab space available, and therefore a huge and tremendously pressing need for supply. Office space is also in deficit.

(3) Over the period to 2028, some lab floorspace and office floorspace will come on stream, and there will in addition be some movement between premises and therefore some recycling of existing space. However, Mr Bryan, on behalf of the appellant, does not believe that sufficient space will become available to meet the benchmarked demand figure per year or overall. His view is based on a fine grain of knowledge of the sites in the market. His view is that in the short term (by 2024) there is insufficient floorspace to meet even the lower notional 461,000 sq ft a year target.

(4) The demand slate is not wiped clean at the end of every year regardless of how much floorspace has been delivered – it compounds as unmet need.

(5) In the medium term, (2025-2028), Mr Bryan does not think that sufficient floorspace against the notional benchmarks will be available. He thinks that without this site, only 374,000 sq ft per year will be available to the market, considerably less than the lower annual benchmark figure put forward by Mr Kinghan of 461,000 sq ft.

(6) Mr Kinghan thinks that 398,000 sq ft will be available each year in the medium-term period, again, less than the lower notional annual need on Mr Kinghan's basis.

(7) Mr Kinghan's 398,000 sq ft is based on an assessment which includes 270,400 sq ft of floorspace which should not be counted:
(a) Wellcome One which is not for the market but for the Institute,
(b) AZ at CBC which is an owner occupier not on the market, and
(c) ARM at Peterhouse Technology Park, which is double counted, as Mr Bryan's note of 23 June 2023 makes clear. Taking those sites out, there would be a further deficit against the notional 461,000 sq ft pa need figure.

6.118 Mr Kinghan argues that there are sites with outline permission which ought to be included.[53] Mr Bryan does not consider that one can rely through to 2028 on these sites because:

(a) Space at St John's Innovation Park has the impediment that it requires the demolition of a building which currently has two tenants.

[53] ID 1.24

(b) Wellcome Genome Campus has no detailed consent and is a greenfield site
(c) CITP has the same owner as Granta Park and Mr Bryan considers it extremely unlikely that the space would be promoted at the same time
(d) Eddington has no detailed consent.
(e) West Cambridge has no consent at all at the moment, and the University is focused on its own needs.
(f) Cambridge Biomed has no detailed consents.
(g) Plot 9 CBC has no detailed consents.

6.119 These sites should be discounted from the supply in quantitative terms. There is no reliable, market-facing evidence that more supply for labs and offices will come on stream by 2028/29 than even the notional ideas of annual need. In addition, that figure itself, needs to be very carefully weighed up, given the evidence that Mr Bryan gives about the amount of pent-up demand, the cumulation of unmet need over the short term, and the sense in the market that Cambridge is on the cusp of another major upswing in market demand.

6.120 In qualitative terms, the market has shown a clear preference for highly connected, urban sites rather than the traditional business park or campus. That places further emphasis on the North Cambridge site and is why the parties agree that when the lab and office floorspace proposed comes forward, it will find tenants in those sectors.

6.121 In conclusion, there is no persuasive basis to give the delivery on this site of nationally important labs and office space anything less than the highest level of positive weight. The cumulation of the weight to be given to the scheme's various benefits would be, as Mr Derbyshire says, very great indeed.

Balancing exercises and conclusion

6.122 The heritage balance under NPPF paragraph 202 is met by the scheme, as the enormous public benefits of the scheme outweigh the heritage harm given due weight pursuant to the NPPF.

6.123 The scheme accords with the development plan overall because of the extensive compliance and the relatively small degree of non-compliance with landscape and visual policy (the heritage harm is outweighed for the purposes of NH/14 by the benefits), and material considerations add further very great weight to the argument for the grant of permission.

6.124 The nub of the dispute here is the scale of built form perceptible from the eastern edge and much stress is laid on it all being a matter of judgement. The Council acknowledges that the site must bring forward a high-quality example of urbanism which meets the operational needs of the market, in buildings which can be prominent, and should be urban and seen to be urban. The setting is views and assets for which the relative proximity of the urban edge is already a key characteristic.

6.125 If permission is granted, this will be a fine example of modern sustainable development in one of the UK's most important places and will achieve the aspirations of national and local policy. For these reasons, and subject to the

conditions as discussed and the s.106 obligations, the appellant respectfully asks that the appeal be allowed, and permission granted.

7 The case for South Cambridgeshire District Council

7.1 This summary contains all material points in relation to the Council's case and it is substantially based upon the closing submissions of SCDC. It is also taken from the evidence given on behalf of the Council and from other documents submitted to the Inquiry and the Council's response to the EA additional comments in relation to the EA review of the Cambridge Water Company scenario modelling.

7.2 The Council is a pro-active and pro-growth local planning authority. It has been successful in planning for growth within its vibrant and thriving administrative area. This is seen in its delivery of housing and its constructive, plan-led approach to office and lab space. South Cambridgeshire's successful economy is important locally, regionally and nationally. The Council supports the principle of development on this site and the mix of uses proposed in the application. The site is previously developed land in a highly sustainable location and forms part of a major allocation within the adopted local plan.

7.3 Whilst the scheme would give rise to significant social, economic and environmental benefits, the proposed development will also give rise to a range of social and environmental harms, including harm to heritage assets and landscape and visual impacts. Fundamentally, the scale, height and massing of the proposed development is not an appropriate response to the site and its context and for these reasons the proposed development does not achieve high quality design.

7.4 The appellant and the Council largely agree on the weight to be attached to the emerging NECAAP and the emerging Greater Cambridge Local Plan. As to the evidence base, Mrs Bradley, on behalf of the Council noted that whilst the evidence-based assessments had not been formally tested, in some instances – such as the NEC Landscape Character and Visual Impact Appraisal (LCVIA) – both parties' experts had agreed these were "*robust*" in the methodology they used. Mrs Bradley took the common-sense view that the evidence base was material to the decision-maker's judgement in this appeal.

Design and Context

7.5 The Council submits that the proposed development does not achieve the high-quality design sought by the NPPF. Choices made in the design process contribute to achieving the ten characteristics of place set out in the National Design Guidance. The appeal scheme fails to respond appropriately to its context.

7.6 The context of the site is mixed. To the south is the station, the hotel building, and office building One Cambridge Square. To the east, train tracks, residential areas and the sensitive River Cam corridor. To the north and west, areas likely to undergo further transformation. Ms de Boom's evidence, on behalf of the Council, contends that the cumulative impact of the design proposals relating to land use distribution, block structure and urban grain, height, massing, scale and design of buildings results in a development that lacks variety and does not positively contribute to local context.

7.7 The Council's case is that the masterplanning over-prioritises the delivery of employment floorspace at the expense of responding appropriately to the sensitivities of the site's context. This is reflected in the significant landscape, visual and heritage impacts which would be caused by the proposed development.

7.8 The Architectural Design Principles within the appellant's masterplan identify some of the central challenges relating to the design of the commercial buildings. These include ADPC1, breaking down massing and avoiding long monotonous facades. The need for particular care to be taken with the application of design principles in relation to the eastern edge to ensure that visual mitigation impacts were maximised, given the low-lying context along the edge.[54] The Council disagrees that the type, amount and siting of commercial buildings, and the proposed arrangement successfully respond to the specific challenges of this particular site.

Land Use, Distribution and Block Structure

7.9 Ms de Boom, noted that the area east of Milton Avenue is primarily commercial, and considered that activity generated by people coming and going to these buildings would be relatively limited outside weekday AM and PM peaks and lunchtimes. The commercial development in the appeal scheme, with the exception of building S04, is located east of Milton Avenue. She contended that the quality of spaces was compromised by concentrating uses in particular areas and that the scheme would not help to build a thriving community by offering the right distribution of offices, commercial, residential and open space.

7.10 Whilst acknowledging that a large floor plate design with a single central core was commercially attractive and allowed for sub-division, she nevertheless considered that this created significant challenges. In particular it provided limited opportunity for stepping, which restricted any capacity to manipulate the building form to soften impacts. This was especially problematic given that the commercial buildings were distributed along the sensitive eastern edge of the site. She found that long elevations would make buildings appear boring and overbearing.

7.11 The NEC Townscape Strategy recommended a finer-grained approach to development, with street blocks broken into smaller independent plots.[55] Ms de Boom observed that because of choices made as to layout, height, quantum, scale and massing of the proposed development, the masterplan is overly reliant on elevational and architectural design to overcome fundamental and, inherent issues that relate to land use type, distribution and block structure.

7.12 The appellant 's design response seeks to animate the ground floor level through the introduction of class E and F uses along the main streets. Ms de Boom doubts that this would provide a vibrant and animated streetscape. Her view was that the urban character of the place and the vibrant public realm envisaged in the masterplan is not compatible with the extensive large floor

[54] CD 8.04d pages 60-61
[55] CD 5.15 Paragraph 5.2.8

plate lab-office uses and the relatively segregated nature of the residential uses proposed.

7.13 Buildings S05, S06 and S07, which align with the railway. would create a long, continuous and monotonous building line that would provide an abrupt transition between development and the countryside beyond. The gaps between the buildings along the eastern edge would be relatively narrow and would not be perceived. Larger gaps would create more significant green breaks, creating greater permeability between the structures to break up what was otherwise perceived as a long, uniform street, inconsistent with the LCVIA and Townscape Strategy.[56]

Building S04

7.14 One Milton Avenue (building S04) is a proposed seven storey office building with basement parking for cycles and vehicles and ground floor retail. It would have a maximum height of 30.85 metres, with terraces stepping down on the eastern, southern and northern elevations. Ms de Boom contends that the design is not a successful juxtaposition. The design is contrary to the Townscape Strategy which indicated that no further taller buildings were needed in this part of the site. The LCVIA modelled development of 21m on this part of the site. In consequence of its height, building S04 is seen rising behind the buildings on the eastern edge in views from the east.[57] It also adds to the bulk of development seen from Discovery Way.

7.15 The height and massing of Building S04 has an adverse impact in views from the east and from residential areas closer to the site.[58] Ms de Boom also considered that the cumulative impact of building S04 and One Cambridge Square on the residential development on Discovery Way would be overbearing as the structures would appear as a tall and continuous wall of development rising above the existing homes.

7.16 There is no good design reason for a building to fulfil a mediator role to match the height of an adjoining building. Buildings of different heights can sit comfortably next to each other. The most dominant feature of One Cambridge Square's elevation is the height of the brickwork. The brick top floor of S04 extends a full storey above that brickwork (to 27.91m). Moreover, the top of the plant screen is more visually dominant and taller than that of One Cambridge Square. Ms de Boom did not feel that the elevational design was successful in breaking down the massing of the building. Although the building appeared as two separate volumes on the eastern side (Milton Avenue), the result was unbalanced. Whilst the front volume would appear large and robust, the second volume would appear feeble in comparison.

7.17 Building S04 turns its back onto Chesterton Way and would be dominated by a service and access function. The lack of landscaping proposed on Chesterton Way compounds this issue. It fails to align with the NEC Townscape Guidance

[56] CD 5.13a & CD 5.15
[57] CD 9.04 Figure 7 page 25
[58] CD 9.04 Figures 7, 8, 9 and 10

which seeks frontages towards the CGB. This would contrast with the proposed residential blocks and create an incoherent streetscape.

Buildings S06 and S07

7.18 Buildings S06 and S07 are designed to relatively specialised requirements, including increased floor to ceiling heights. There is common ground that the design approach proposed is successful in breaking down the massing of the buildings when viewed from nearby.

7.19 Buildings S06 and S07 are taller and more continuous than the recommended heights set out in the Townscape Strategy and the LCVIA. The lack of variation in building height means that there is little articulation would be visible in the roofline, and in any event is lost by the presence of other buildings in the masterplan rising above it.

7.20 The architectural design of buildings S06 and S07 is nearly identical and the continuous repetition of the design across a very long development complex means that there is a loss of distinctive architectural style. This part of Station Row would lack variety and human scale, and the buildings would feel boring and overbearing.

7.21 Ms de Boom considers that the articulation within the buildings would not be perceptible at a distance and that the landscape terrace would not be effective in reducing scale and massing or read as part of the landscape. The proposed trees would not mitigate the impacts of the proposed development. Overall, the 150m long, 4-storey form would dominate on the skyline and be overbearing on the eastern edge.

Buildings S08 -S21

7.22 Although buildings S08-S21 are outline proposals, the appellant has produced relatively detailed illustrative designs, which are followed closely in the parameter plans. The LPA has identified several issues with these proposals.

7.23 Building S09 and the residential quarter would be viewed rising above S06 and S07, compounding impacts on the sensitive eastern edge, resulting in landscape, visual and heritage harms. The height and massing of Blocks S13-S16 would also have a negative impact on views from Discovery Way. The parameter plans would indicate that the northern elevation of S09 (overlooking the Wild Park) is considered the back of the building and any attempt to activate that side of the building is likely to struggle until development to the north comes forward as part of the wider masterplan area.

7.24 The appellant recognises that, ideally, single aspect units should be avoided. The use of perimeter blocks which is done to keep residential heights lower, is welcomed. The proposed illustrative design includes approximately 25% single aspect and 75% dual aspect dwellings.

7.25 Ms de Boom considers that in a large proportion of what the appellant considers to be "dual aspect" homes, the second aspect is created by the stepping of the building to create a second external wall. The benefits of dual aspect dwellings include allowing cross ventilation, more daylight for longer periods, more

extensive views and access to cooler or quieter sides of a building. A single window or door would not deliver many of these benefits. Accordingly, many of these dwellings as designed are "*enhanced single aspect*".

7.26 The stepping of the building form to create the second elevation may not be acceptable at reserved matters stage because such stepping could cause issues with overlooking and overshadowing of adjoining buildings. The detailed parameter plans would impose restrictive constraints on future design solutions particularly when the height parameters are considered. The appellant has recognised that this may lead to a reduction in the number of units which can be delivered.

Landscape Design

7.27 There are also a number of issues with the landscape design.

a. The lack of planting at the street level of 1 Milton Avenue (S04) is not a deliberate design decision, but rather a consequence of a lack of space for it

b. The Wild Park is in the northern part of the proposed development. The 2009 SPD sets out quantitative and qualitative guidance for the provision of open space.[59] In qualitative terms it provides that open spaces should be fully integrated into the design and children's play areas should be very accessible and visible rather than utilising areas left over after planning. The Wild Park feels like an afterthought. It is away from the main movement network of the development and is not overlooked by residential properties. Instead, it is overlooked by the rear of an office building which is unlikely to provide any natural surveillance outside of office hours.

c. The landscape mitigation does not sufficiently address the central concerns associated with the sensitive eastern edge. The trees proposed would reach 12m after 15 years and continue to grow taller over time. However, the filtering effect does not sufficiently soften the edge.

Landscape Character and Visual Effects

7.28 Landscape judgements are informed by national and local policy, as well as by guidelines for landscape and visual assessment provided by the Landscape Institute ("GLVIA 3").

7.29 Both Mr Smith and Mr Wakefield have at times reached a different judgement from that set out in the Bidwells LVIA, and from each other. Experienced and knowledgeable experts have formed their own views of the scheme. All three landscape experts – Mr Wakefield, Mr Smith, and the authors of the Bidwells LVIA – consider that harm of varying degrees arises from the height and scale of the buildings proposed on the appeal site. The central dispute between the appellant and the Council is over the professional judgements reached as to significance and extent of the effects of the proposed development in landscape character and visual terms.

[59] CD 5.31

The NECAAP LVIA Evidence Base

7.30 The North East Landscape Character and Visual Impact Appraisal – Development Scenarios document (the TEP Report) considered three development scenarios on land including the appeal site (as parcel 4 of that study).[60] Mr Smith, on behalf of the appellant considered that the TEP Report bases its conclusions upon a robust, methodical approach to landscape and visual matters.

7.31 The TEP Report provides an appraisal of existing landscape character and visual amenity and an appraisal of potential effects of high, medium and low development height scenarios. This modelled development of variable heights of 12m along the eastern edge and between 18m and 21m on other parts of the appeal site.[61] On no sensible analysis does it envisage buildings ranging between 27 meters and 36 meters high on the appeal site as Mr Smith contends.

7.32 The Council considers that the heights of the proposed development does not accord with those modelled in the TEP Report. Amongst other matters it sets out that the height and massing of buildings should avoid dominating views of the skyline from the east and should avoid creating an abrupt transition from development to the rural edge.

7.33 The LVIA aspects of the AAP evidence base, including the TEP Report are robust, and the guidance on height and massing underlines the relative sensitivity of the surrounding landscape to development on the appeal site. The proposed development does not avoid extending development across the skyline and insufficient thought has been given to variable setbacks or the creation of a variable roofline. There is also an absence of permeable built form. Accordingly, the proposed development is not an appropriate response to the sensitive eastern edge because it does not avoid an abrupt transition between the development and the countryside.

The Townscape Strategy[62]

7.34 The Townscape Strategy is built on the evidence base provided in the Townscape Assessment, the HIA and the LCVIA. [63]It sets out a series of townscape principles including the need to respond sensitively to and preserve the special character of the River Cam Corridor, meadows and Fen Ditton and respond appropriately to the adjacent residential context by stepping heights and densities towards its interface with existing settlements and avoiding stark contrasts with existing neighbouring buildings.

7.35 It sets out that heights on the appeal site should be up to 15m with a local landmark building of up to 21m. It provides that the hotel and office building which provide prominence and legibility to the gateway and further taller buildings are not necessary in this area.

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[60] CD5.13a & 5.13b
[61] Block 4 in the TEP Report
[62] CD5.15
[63] CD 5.15

The River Cam Valley

7.36 The appellant agrees that the River Cam corridor is a valued landscape. The character of the site is influenced greatly by its surrounding townscape and landscape features. The site lies adjacent to the River Cam corridor which as Mr Wakefield emphasised forms an important strategic green sinuous space through Cambridge from the northeast through the City to the southwest. This green corridor contributes to the distinctive landscape of the setting of the City, and pressure for recreation and housing, were two specific landscape sensitives identified by Mr Wakefield.

7.37 Landscape Character Area (LCA) 9a has a rural and pastoral character and forms a distinctive approach to the city. LCA 9a is an aesthetically pleasing area that is well-used by people on and off the water. The proposal fails to protect views from and the character of LCA 9a due to impacts on skyline and the rural nature of this character area.

7.38 In the LVIA process, landscape value is combined with an assessment of the susceptibility of the landscape to form a view on landscape sensitivity. Sensitivity and magnitude are considered together to reach a view on significance. It follows that these professional judgements at each stage of the LVIA process impact the overall assessment of significance of effects.

7.39 Mr Wakefield, on behalf of the Council, agrees with the assessment of landscape sensitivity, magnitude and significance of effects for three of the character areas considered in the Bidwells LVIA, namely the Railway Corridor; the landscape setting of Fen Ditton CA; and the townscape setting of Riverside and Stourbridge Common Conservation Area.

7.40 Mr Wakefield considers that LCA 9a, the River Cam Corridor has a high sensitivity, In relation to sensitivity, whereas the Bidwells LVIA and Mr Smith two identify high/medium sensitivity. The reason for this difference is that Mr Wakefield disagreed with the Bidwells LVIA's treatment of susceptibility, considering it should be high and not medium because the landscape has a strong landscape structure and a low capacity to accept change. By contrast, Mr Smith sought to classify sensitivity as "medium" based on his assessment that the area has "some capacity" to accommodate the proposed development.

7.41 The test for high susceptibility in the Bidwells methodology is that the receptor "*cannot accommodate the proposed development without notable consequences for the maintenance of the baseline*".[64] Mr Wakefield contended that the landscape is a strong defining characteristic of Cambridge and of regional importance. He identifies the notable consequences are an increase in urbanisation and impacts on pastoral and rural qualities of the landscape. It would follow that taking a high landscape value and a high susceptibility would elevate the overall sensitivity to high rather than medium-high, as contended by Bidwells and by Mr Smith.

7.42 Mr Wakefield concluded that the landscape effects would be of a medium magnitude rather than a low magnitude (the latter position being adopted in the

[64] CD 1.40, p.4

Bidwells LVIA and by Mr Smith). The proposals would result in a moderate alteration to key landscape characteristics including the rural and open character of the LCA. Mr Smith's analysis is that the proposed development would only "*cause a small increase in built form*" (in support of a finding of "*low" magnitude*"). However, there would be inter-visibility between the appeal site and the LCA. The scale, mass and horizontal nature of the development would create an elevated impact, beyond the conclusion drawn by Mr Smith and in the Bidwells LVIA.

7.43 When considering magnitude, it is relevant to consider several factors such as duration, geographical extent and scale. The effects on the receptor would be long term in relation to increased urbanisation and impact on pastoral qualities. The geographical extent would be discernible across a moderate proportion of the character area. The size and scale of effects are also material. In particular Mr Wakefield emphasised the moderate alteration to key landscape characteristics including to a key perceptual quality, namely the rural and open character of the area, via the introduction of a significant quantum of built form extending a horizontal urban edge. Accordingly, Mr Wakefield's assessment of "medium" magnitude is eminently reasonable.

7.44 Mr Wakefield considered that the LVIA's approach (and in turn Mr Smith's assessment) underestimated the significance of effects in ascribing only a moderate-minor adverse impact rather than a moderate-major adverse impact to LCA 9a.

7.45 The skyline of Cambridge is highly valued, and the character area is of high/medium sensitivity. However, the appreciation of the skyline of Cambridge is not confined to the city centre but starts on the rural/urban fringe. The parties differ on the magnitude of effects. Mr Wakefield considers that the magnitude of effects is medium/high, whereas the Bidwells LVIA reaches a judgement of medium, and Mr Smith reaches a judgement of medium/low. Mr Wakefield emphasised that the urban fringe context was important in considering the appeal site. Whilst development on the A14 had been referenced as introducing horizontal features around Cambridge's northern fringe, these features tended to be modern and detrimental introductions to the existing and historic landscape context of the City and its surroundings.

7.46 Due to his judgement on magnitude, Mr Wakefield concluded that the significance of effects had been underplayed and was more pronounced than identified in the Bidwells LVIA (moderate/major adverse rather than moderate/neutral). Even Mr Smith's assessment concluded that the increased visibility of built form on the skyline in this location is judged to be negative in character, in concluding that the proposed development would cause moderate adverse effects to the Cambridge skyline receptor.

7.47 Overall, Mr Wakefield considered that significant moderate/major adverse effects on several receptors would be felt. The landscape sensitivity of LCA 9a River Cam Valley Cambridge is high; the magnitude on impacts is medium/high and the significance of effects are moderate/major adverse which is significant and impacts on a valued landscape. The impact on the Cambridge skyline is more pronounced than stated in the Bidwells LVIA (which refers to moderate neutral effects). In summary, the approach adopted in the Bidwells LVIA (and

amplified in Mr Smith's evidence) results in a series of judgement calls which effectively downplay the landscape impacts of the proposed development. Mr Wakefield concludes that the effects would be moderate/major adverse. The landscape effect is thus significant.

Visual Effects

7.48 Mr Wakefield noted that existing development has given rise to adverse visual impacts to the east of the site, and emphasised that the proposed development would not mitigate those impacts but would significantly increase landscape visual impacts, particularly to the east. He contends that in a rural-urban context, a more sensitive transition might be expected from the context of the appeal site. Mr Wakefield's view was that a lack of visual permeability had serious implications for visual effects, and that there were viewpoints where greater visual breaks would provide much more significant visual mitigation in terms of landscape and visual impacts, in particular along the sensitive eastern edge and the associated visual arc to the east of the site along the River Cam Valley.

7.49 Mr Wakefield described how the height of the buildings adjacent to the railway line, whilst lower than the highest buildings on the appeal site, remain "*substantial*". The NEC Landscape Character Appraisal was plainly concerned with the potential landscape visual effects on the sensitive eastern edge, hence the refined approach to the relevant block. The proposals include a decrease in height of buildings adjacent to the railway line to respond to the NEC LVIA, but the proposed heights are nevertheless in discrepancy with that assessment and harmful on an objective assessment. Mr Wakefield considered the appellant's approach to be ineffectual in overcoming visual impacts to the east, given that buildings are seen not individually but as an overall mass.

7.50 In considering the impact of the development on the Cambridge skyline and landmark buildings, Mr Wakefield's evidence invites consideration of local landmarks and views and the transition of the skyline from rural to urban on the edge of Cambridge.

7.51 Mr Wakefield emphasises the transition of the skyline from rural to urban on the edge of Cambridge. The rural/urban interface demands careful consideration of mass and height of buildings. His view is that the only real way to reduce or mitigate impacts on skyline is to reduce the height of buildings, reduce the mass, or improve the permeability of views through the site. Mitigation planting would do little to overcome the impact of this height in the longer term and would make no difference at the 15 year assessment point as noted in the Bidwells' LVIA.

7.52 The largest landscape visual impacts are from sensitive landscape receptors to the east of the site: the River Cam Valley; Fen Ditton Conservation Area; Fen Rivers Way Long Distance Footpath; Harcamlow Way Long Distance Footpath; Ditton Meadows; Fen Ditton Village/The Plough Inn; Fen Road. All are important with high levels of sensitivity made greater by widespread recreational activity. Consideration should also be given to the sequence of kinetic views as one travels from north to south along the River Cam, to understand the scale of landscape and visual impacts from these sensitive receptors.

Specific Viewpoints

7.53 *Bidwells viewpoint 5:* Bidwells and Mr Wakefield agree that the sensitivity of the view is high, whereas Mr Smith takes the view that the sensitivity is high/medium. The issue comes down to value. It is agreed that the area is a well-used public footpath within the Fen Ditton Conservation Area and in the River Cam Valley; and that it is part of a valued landscape with views over the River Cam and high scenic quality. The Bidwells methodology summarises qualities associated with high-value visual receptors in table 3.[65] Mr Wakefield and Bidwells both considered that the viewpoint met these qualities. In contrast, Mr Smith sought to contend that the value was not high because whilst the landscape is protected in a paragraph 174 sense, it is not within a national landscape designation. This exchange demonstrated that Mr Smith has undervalued certain viewpoints based on too high a threshold for a finding of a high value.

7.54 *Node viewpoints 1, 2 and 3*: Mr Wakefield identified additional Node viewpoints 1, 2 and 3. Mr Smith addressed these in his rebuttal and accorded a high/medium sensitivity, which, for the reasons set out in relation to Bidwells viewpoint 5, Mr Wakefield considers to be too low. In relation to magnitude, Mr Smith ascribes a low magnitude of effects for these views, whereas Mr Wakefield considers medium change. The Bidwells methodology gives a description of low magnitude.[66] In the light of that description, it is submitted that moderate is a fairer assessment of the magnitude of effects particularly from viewpoint 1. The increase in built form would be readily apparent in this view, resulting in an increased sense of urbanisation and extending the built form across the skyline. This gives rise to moderate / major adverse effects from this viewpoint.

7.55 *On Bidwells / VuCity model viewpoint* 8, despite all mitigation and architectural responses, Mr Wakefield and Bidwells both considered there would be major adverse impacts. Even Mr Smith agrees that impacts would be significant but assesses these as major/moderate adverse. Mr Smith identified high/medium sensitivity, whereas both Bidwells and Mr Wakefield assessed sensitivity and magnitude as high. The architectural features employed have not successfully mitigated the impacts from this view. A landscape-led response should have included reducing the overall height of the buildings (especially Buildings S06 and S07) and taking a more sensitive approach to the colour of the upper parts of the buildings and plant storage.

7.56 Along the eastern edge, Mr Wakefield considered the landscaping to be ineffective at disguising the skyline or reducing the overall visual impact. The horizontal mass would rise above the planting, and due to the limited gaps between Buildings S06 and S07 would read as one block. The proposed development would result in significant change to the view, with the proposed development a dominant and prominent feature.

7.57 *Node viewpoints 22 and 23 (the Plough, Fen Ditton)* The pub gardens are generally accessible to the public for many hours throughout the day and there

[65] CD 1.40, Table 3
[66] CD 1.40, Table B`

is nothing in GLIVA which restricts consideration of such views. Mr Wakefield assessed a major adverse impact, whereas Mr Smith assessed a moderate adverse. Given the evident accessibility of the pub garden, Mr Wakefield was right to ascribe a high level of sensitivity, and he was also right to say that the proposed development would lead to a high magnitude of change.

7.58 *Node viewpoint 21 (River Cam Fen Rivers Way):* Mr Smith accepts major/moderate adverse impacts. His rebuttal identifies high/medium sensitivity, whereas Mr Wakefield reasonably ascribes a high sensitivity to this well-used public right of way. Mr Smith identifies a medium magnitude of effect. Again, for reasons similar to those in Bidwells viewpoint 8, it is submitted that high magnitude is the appropriate assessment leading to a major adverse impact.

7.59 *Views from residential areas* Mr Wakefield considered that Bidwells viewpoint E5 would give rise to a moderate/major adverse visual effect, based on an assessment of medium sensitivity and a high magnitude of change. Although there is an existing visual link between the residential area and existing development, the addition of prominent built form would be overbearing. Mr Smith suggested overbearing was something so dominated by built form that it was almost unliveable. Plainly, this sets an unnecessarily high test. The development would be dominant and prominent and in that sense it is reasonable to conclude that it would be overbearing.

7.60 In conclusion, the proposed development introduces a new and significant urban edge which extends prominent built development across the skyline. In addition to the eastern edge, the bulk of S09 and some of the residential development behind buildings S06 and S07 would be visible as well as the top of building S04 above Building S06. This would be a visually prominent and intrusive proposal that detracts from the pastoral landscape qualities of the surrounding landscape character area, in both landscape and visual terms. When viewed from parts of the nearby residential areas, the proposals would be unacceptably overbearing.

Heritage

7.61 The Fen Ditton Conservation Area (FDCA) and the Riverside and Stourbridge Common Conservation Area (RSCCA) are the closest heritage assets to the site. It is agreed that the development proposals would cause harm to the significance of these two heritage assets.[67] There is common ground on the lack of impact on Anglesey Abbey, and whilst Bait Bite Lock was raised by Historic England, the impact on that area is not pursued by the Council.

7.62 It is agreed that the level of harm would be less than substantial for the purposes of the NPPF. The Council considers that the proposed development would cause a moderate level of harm within the "less than substantial harm" scale to both conservation areas. The appellant considers the level of harm would be at the very lowest end in each case.

[67] CD 6.09, paragraph 6

7.63 An overview of FDCA is provided at paragraphs 3.1 and 3.2 of the FDCA appraisal.[68] In particular, the village has an unmistakably rural feel with its grass verges, large trees and its "*bucolic riverside setting*." The historic connection with the river is also highlighted in the appraisal. The riverside setting is a distinctive feature of the village. Views across the meadows are highlighted as positive features in the FDCA heritage appraisal.

7.64 The RSCCA is a large conservation area embracing the River Cam corridor from almost the Centre of Cambridge north-east until the city boundary and then adjoins the FDCA. It is accordingly, based along the green wedge of the city, and the character of the RSCCA has a more rural feel as one reaches Fen Ditton.

7.65 The North East Cambridgeshire Heritage Impact Assessment makes clear that whilst the NEC site makes no contribution to the significance of RSCCA, "*new development within the NEC site could become visible and form a backdrop and so changes to these views and the significance of the RSCCA should be assessed*". On the FDCA, the North East Cambridgeshire Heritage Impact Assessment notes that "Fen Ditton has a very rural feel to it, surrounded by open space with a tranquil riverside setting". Noting the two parts of Fen Ditton, the North East Cambridgeshire Heritage Impact Assessment goes on to consider that "*The NEC Site area is not visible from these areas, but its low-lying nature for the most part enables it to disappear into the backdrop of the fens from locations on the western edges of Fen Ditton. The NEC Site contributes to [FDCA]*" The North East Cambridgeshire Heritage Impact Assessment identifies clear potential sensitivities in respect of both conservation areas resulting from development on the appeal site.

7.66 For the appellant, Dr Burgess's evidence recognises that views to the river are important contributions of setting to the heritage significance of the FDCA, although he goes on to assert that views of development and urbanising elements have been a feature for more than a century and has not previously been considered to undermine the heritage significance of the area. Dr Burgess considers that the setting of the RSCCA contributes very little to its heritage significance.

7.67 For the Council, Mr Brady's assessment of significance of heritage assets placed both FDCA and RSCCA in a wider context of a "continuous chain" running along the River Cam. The contextual significance of the designated heritage assets relevant to this appeal is similarly acknowledged in the Local Plan: "*the interface between the urban edge and the countryside is a key component of how the city is appreciated in the landscape and contributes to the quality of life and place*".

7.68 Mr Brady emphasised the important relationship between the river corridor, open space and views of meadows and fenland and views across these as components of the significance of the conservation areas and their settings. He emphasised that the conservation areas provide a transition between

[68] CD5.07

countryside and the city. In particular, the river, its landscape setting and its use are central to the significance of the conservation areas.

The North East Cambridgeshire Heritage Impact Assessment

7.69 The North East Cambridgeshire Heritage Impact Assessment was for the whole AAP area but based on the heights in the Townscape Strategy. For the appeal site, the proposed heights in the Townscape Strategy were significantly lower than what is proposed. At 2.1.3 of heritage sensitivities, the Townscape Strategy sets out that "*The principal heritage impact concerns would be from tall buildings that rise above the context and the tree line and become dominant or detracting features on the skyline that may affect the setting of heritage assets or impact on views*." The Townscape Strategy goes on to address particular aspects in relation to FDCA and RSCCA.

7.70 The Council considers that there is a fundamental difference between the proposal assessed in the North East Cambridgeshire Heritage Impact Assessment and the current appeal scheme, and that accordingly the decisionmaker cannot read across the conclusions in respect of that scheme to the scheme under consideration at this appeal.

Harm and Impact

7.71 In the case of both conservation areas, it is the increased sense of urbanisation which results in harm. Dr Burgess summarises the issue as "… *the feeling of intensified, more urban development in occasional views out from the [RSCCA] and [FDCA]"*. Mr Brady and Dr Burgess differed in their view as to the extent of harm.

7.72 The proposed development would add to existing commercial development on the northern fringe of Cambridge, increasing the sense of development, and would alter the relationship between the village of Fen Ditton and the river. One aspect of heritage harm arising is the increased sense of urbanisation on the FDCA and the consequential negative effect on the significance of the FDCA. In relation to the RSCCA, one aspect of heritage harm arising is the impact of further development on one's appreciation of gradually moving into a more rural landscape.

7.73 Dr Burgess took the approach that the proposed development would add to existing commercial development but would not fundamentally change the relationship between the river setting and the conservation areas. He accepted that increased urbanisation would cause limited harm to the significance of the FDCA. In relation to the RSCCA, he considered that the visibility of buildings, in principle "*does not... harm its character if anything it defines it*". Nevertheless, Dr Burgess accepted that "*the feeling of increased development*" would cause "*slight*" harm to one's appreciation of gradually moving into a more rural landscape.

7.74 Mr Brady considered the implications of the eastern side of the appeal site being more openly apparent from distances. His view was that the proposed development would form a further urbanising element expanding and intensifying the urban backdrop. He also considered that a concentration of built form at scale would make a "*much greater*" intrusion into the skyline and

existing tree and hedge backdrops to the conservation areas. By way of example, the potential negative presence is clearly illustrated from several viewpoints in the Vu-City Technical Visualisations (such as viewpoints 6, 8 and 15).[69] He considered the components affected to be of fundamental importance to the designated assets character.

7.75 Mr Brady considered that the proposals would constitute a permanent change to the visual quality of the heritage assets' setting and would have a negative effect on the way in which those assets are experienced and appreciated. In particular, in relation to FDCA, the intensification of urban development detracts from the bucolic riverside setting of the village. In relation to RSCCA, the feeling of increased development of more than 2-3 storeys which one might associate with the suburbs would cause harm to one's appreciation of moving into a more rural landscape, especially given that the proposed development would be a substantial increase on the existing hotel and office which are intended to frame the station.

7.76 The proposed development fails to meet the policy imperatives of the NPPF and the Local Plan (namely Policies HQ/1 and NH/14). In particular, the appeal scheme fails to conserve or enhance the conservation areas (contrary to Policy HQ/1); and the appeal scheme does not sustain and enhance, or respond to, local heritage character (contrary to Policy NH/14 of the Local Plan).

7.77 The proposed development would constitute a permanent change to the visual quality of the heritage assets' setting and would have a negative effect on the way in which they are experienced and appreciated. Accordingly, Mr Brady's professional view, which is shared by the statutory consultee Historic England, is that in respect of both RSCCA and the FDCA, there would be a moderate level of less than substantial harm. The Council invites the decisionmaker, in exercising their own judgement, to reach the same conclusion.

Planning

7.78 The appeal falls to be assessed in accordance with the extant development plan. Policy SS/4 makes it clear that applications are to be assessed on their own merits.

7.79 On reason for refusal 1 (landscape), Mr Wakefield's evidence informs Mrs Bradley's planning evidence, and in particular her analysis of policy, in the following ways:

(i) Bidwells' LVIA underestimated views from the east of the appeal proposal informed Mrs Bradley's conclusion the appeal proposal did not fully take into account the environmental constraints of the site contrary to Policy SS/4(4a).

(ii) The height, massing and scale of the building design does not positively contribute to local context and informed Mrs Bradley's view that the proposal does not accord with Policy HQ/1 of the Local Plan.

[69] CD 9.06 paragraph 8.9

(iii) The proposed development does not respect, retain or enhance the landscape, and results in a significant level of harm or adverse effect in landscape or visual terms. As such the proposed development does not accord with policies NH/2 and NH/8 of the Local Plan and paragraph 130(c) and (d) of the NPPF.

7.80 Development along the A14, at Eddington, Cambridge Biomedical Campus and at Cambridge West demonstrate the Council's willingness to grant permission for large scale commercial development including on sensitive visible edges of the city. However, the developments discussed are generally lower in height than the appeal proposal, and do not justify the heights proposed here.

7.81 On reason for refusal 2 (heritage), as a matter of national policy, any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. The evidence of Mrs Bradley is that applying the balance in paragraph 202 of the NPPF, the public benefits arising from the proposed development do not outweigh the great weight she has afforded to the less than substantial harm resulting from the proposal. Mrs Bradley noted Mr Brady's conclusion that in relation to the two conservation areas, the impact of urbanisation resulting from the proposed development impacts on the sense of a transition between rural and urban areas. A finding of less than substantial harm identified by both parties does not support the conclusion that the proposals sustain, enhance or respond to local heritage character. She accepted Mr Brady's judgement that the proposed development would result in a moderate level of harm to FDCA and RSCCA, within the less than substantial harm scale.

7.82 On reason for refusal 3 (design), Mrs Bradley acknowledged that the Council agreed with the proposed nature of the use of the site, and adopted Ms de Boom's conclusions that whilst there were some high-quality design aspects of the site, the proposal as a whole was not high quality. In particular, the cumulative impact of the design proposals relating to land use distribution, block structure and urban grain, and the height, massing and scale of design of buildings results in a development that lacks variety and a comfortable human scale and does not positively contribute to local context.

7.83 Strategic objective S/2 sets out the vision for the Local Plan to be secured through the achievement of six key objectives, which is about achieving a balance between supporting the economy, providing for housing needs and protecting the environment. The proposals do not meet two of the key objectives in Policy S/2 in that the proposal fails to protect the character of South Cambridgeshire, including its built and natural heritage; and it fails to deliver high-quality, well-designed developments. Further, the proposals do not achieve sustainable development due to the landscape and visual harm, heritage harm, and failure to provide a well-designed overall scheme, contrary to Policy S/3.

7.84 The proposal does not strike the right balance in relation to delivering all the objectives of the Local Plan. Mrs Bradley emphasised that such balance is important to ensure Cambridge continues to grow in a way that retains Cambridge's defining and distinctive characteristics.

7.85 The appeal site forms part of the major development site allocation within the Local Plan as referenced in Policy SS/4. Mrs Bradley considered that the proposal conflicted with part 2 of the policy by not being high quality. She considered that the proposal conflicted with part 4 by failing to take into account existing site conditions and environmental and safety constraints (principally relating to the effects of the proposal in the landscape and visual terms).

7.86 Policy HQ/1 does not preclude prominent development, but as Mrs Bradley noted the policy clearly sought to preserve or enhance the urban and rural character, respond to context, and respect local distinctiveness. Her view was that the proposed development fails to adhere to Policy HQ/1.

7.87 The proposal does not respect, retain or enhance the local character and distinctiveness of the local landscape and of the individual National Character Area in which is it located, contrary to Policy NH/2.

7.88 Whilst there is no allegation of harm to the openness of the Green Belt or the purposes of including land within the Green Belt, Policy NH/8 provides that development on the edges of settlements which are surrounded by the Green Belt must include careful landscaping and design measures of a high quality. It was agreed by Mr Derbyshire in cross-examination that this policy applies to the appeal site but Mrs Bradley considers it to be breached because the design of the scheme overall is not high quality.

7.89 In terms of an overall planning balance, Mrs Bradley noted that there was relatively wide-ranging agreement between the appellant and the Council, and that the areas of disagreement are clearly delineated, as set out in the updated Statement of Common Ground.

Economic benefits

7.90 The appellant and the Council both produced detailed evidence on the economic need for offices, labs and research and development space. The wider context is one of relatively limited disagreement between the parties on the issue. There is an acknowledged need in Cambridge for offices and laboratories in sustainable locations given the role of the area as an internationally leading Life Sciences and technology cluster. There is no dispute that the proposed development would be likely to let. No one site or building is critical to meeting the employment needs of the area nor is delivery of a particular quantum of floorspace on this site critical to meeting anticipated employment needs over the plan period or to the success of the local economy.

7.91 Mrs Bradley maintained her assessment that affords the need for employment land and employment benefit "*considerable weight*". Mr Derbyshire similarly retained his view that the need should be afforded "*great weight*."

7.92 The Council is a pro-growth, pro-business authority who actively seek to assess development needs and plan for them where it is sustainable to do so. The Council maintains the need for a quality and place driven approach to sustainable growth in order to support what is special about Cambridge and the Cambridge economy. This reflects the Council's ambition not only to support the

delivery of employment floorspace but also to ensure that what is permitted is high quality, sustainable development.

7.93 Policy S/5 in the South Cambridgeshire Local Plan 2018 includes that "*Development will meet the objectively assessed needs in the district over the period 2011- 2031 for 22,000 additional jobs*". The Local Plan identified a supply of land that was sufficient to provide the predicted 22,000 additional jobs plus sufficient surplus that would also ensure that if the economy performed better than expected, the plan would not constrain economic potential. The adopted local plan also includes allocations at the Cambridge Science Park, Fulbourn Road, Cambridge Biomedical Campus as well as employment opportunities at planned new settlements. The wider strategy also includes developments within Cambridge City at West Cambridge and CB1. The Council has also granted planning permission for substantial further development, at the Wellcome Genome Campus, for example.

7.94 The proactive approach of the Council on this issue is also seen in the emerging Joint Local Plan (currently at Reg. 18 Preferred Options stage). Of course, the emerging Local Plan has not yet been adopted. Whilst the evidence base has not yet been tested through examination, it has not been substantially challenged at this Inquiry.

7.95 Mr Kinghan, the author of the Greater Cambridge Employment and Housing Evidence Update, stressed the overall thrust of that evidence base in general plan making terms. The context of the evidence base is to look across the next 20-year period and think about how the Council should provide a flexible and sufficient supply to meet demand. He noted that there may be periods where demand exceeds supply as the market works to respond to demand. Mr Kinghan acknowledged that we are in such a period, but the pipeline of supply is significant and the overall picture is of positive, plan-led growth.

7.96 In general terms, the evidence base indicated a need to double the provision of office and commercial laboratory space over the proposed plan period with 10 million sqft for the area, on top of the existing approximately 10 million sqft that exists.

7.97 The evidence base shows that the projected supply of employment floorspace in the plan period would essentially produce a balance (with a limited surplus) in office / R&D combined. In addition, the emerging Local Plan (first proposals) allocations would provide additional office and R&D floorspace providing for significant proposed allocations at North East Cambridge, Cambridge East, Cambridge Biomedical Campus and Babraham Research Campus.

7.98 This further supply is considered beneficial in encouraging growth and given the inevitable sensitivities and uncertainties in modelling outcomes and the benefits of ensuring a post plan pipeline. Whilst the exact floorspace to be delivered within the Plan period is not yet known, the pipeline of supply is significant and the overall picture is of positive plan led growth. It should also be recorded that in response to the Inspector's questions, Mr Kinghan confirmed that his assessment of employment needs is not constrained by housing numbers but rather the housing need recommendations are derived from the employment growth forecast.

7.99 On demand, for the appellant, Mr Bryan's approach is to look at existing market demand and extrapolate from there. Mr Kinghan acknowledged that Bidwells have a high quality of local data on demand profiles and accepted the appellant 's demand figure as reasonable, albeit noting the inherent uncertainty in future projections. Furthermore, the appellant 's use of gross take-up figures does not account for existing space being released back into the market.

7.100 Mr Kinghan acknowledged that existing demand is high and would exceed supply in the near-term (to 2025), but he noted there is supply that is forthcoming that would alleviate the imbalance between demand and supply. Accordingly, in the medium (to 2030) and longer term (to 2041, Plan period), the picture is much brighter. Of course, the appeal proposal would not be delivered in the short term but would come forward in the medium term when a number of other schemes are also likely to be delivered and contributing to meeting demands.

7.101 The appellant 's approach is market-led. In summing up during the round table, Mr Bryan was clear that there is a need for the site according to the demand seen today, and in qualitative terms, considered that it is important for Cambridge – as an internationally competitive destination for the Life Sciences and associated industries – to offer offices and laboratories in a highly sustainable location.

7.102 The Council takes a broader, plan-led approach The adopted local plans enable development at the Science Park and identify wider development opportunities at North East Cambridge. Cambridge Biomedical Campus, West Cambridge, and Fulbourn Road on the east of the City are also identified. These complement city centre developments at CB1 near Cambridge central station. Outside Cambridge the southern employment parks which focus on life sciences continue to develop, with a major expansion granted planning consent at the Wellcome site. There are also employment development opportunities at the new settlements. The emerging Greater Cambridge Local Plan proposes further development, including a mixed-use development on the Airport site and potential for further development at the Biomedical Campus.

7.103 There is an acknowledged need for further office and laboratory space, and a demand for further space. The Council is working to address this issue in a sustainable way. This includes granting permissions for the right schemes, allocating sites and working with developers on numerous pre-applications to ensure a robust pipeline of supply.

7.104 Any imbalance between short term demand and supply does not justify the over-development of this site. The quality of place should remain a guiding principle when considering the proposed development. Mrs Bradley agreed with the appellant 's view that considerable weight be given to the 'cluster' effect and additional employment.

Social benefits

7.105 *Housing*: The appellant and the Council agree that considerable weight is attached to housing need. South Cambridge District Council and Cambridge City Council together have 6.1 years of housing land supply for the 2022-2027 five-year period. Mrs Bradley noted that from the adoption of the relevant local

plans, the Councils have together demonstrated a 5-year housing land supply. For the period 2011-2031, the housing trajectory predicts delivery of 23,475 dwellings in South Cambridgeshire District Council's area – some 3,975 dwellings above the housing requirement. ID20 sets out that it is anticipated that the Council would continue to have a rolling five-year housing land supply when calculated using the standard method.

7.106 *Public realm and open spaces:* In relation to public realm and open spaces, Mrs Bradley identified the difference between the appellant and the Council's weighting (considerable versus limited positive weight). As she explained, the reason for this difference was based on a view that whilst parts of the public realm were high quality, the Wild Park could not be said to be fully integrated into the design, and whilst it is near the movement network, the siting is relatively poor, resulting in residential users having to cross two roads including the main access road in the site.

7.107 *Wellbeing and inclusion*: There is limited dispute as to the weighting for wellbeing and social inclusion, but as Mrs Bradley noted this dispute is not determinative of the application.

7.108 *High quality architecture*: Mrs Bradley attached moderate weight to this benefit rather than the great weight ascribed by the appellant in recognition that despite her acceptance of Ms de Boom's judgement that overall the scheme did not achieve high-quality design, some elements are high quality. The suggestion that there was some double counting by Mrs Bradley is an unfair criticism of what was an effort to be fair and recognise some positive elements of the scheme.

7.109 *Other social benefits*: There is agreement that amenity and meanwhile uses are afforded moderate weight, and that the s.106 includes provision for on-site community use within the residential quarter, a benefit which should be given moderate weight.

Environmental benefit

7.110 *Making effective use of land*: Mrs Bradley accepted that substantial weight should be given to the use of brownfield land in accordance with paragraph 120(c) of the NPPF. However, she explained that paragraph 119 of the NPPF requires a balance to be struck between meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. That balance has not been appropriately struck in this case.

7.111 Mrs Bradley affords great weight to the sustainable and accessible location of the appeal site and the response to the climate emergency and BNG.

7.112 *Landscape and visual impact*: Overall, the significant and permanent adverse effect identified by Mr Wakefield is afforded great weight by Mrs Bradley.

7.113 *Heritage harm*: Given the importance the NPPF places on conserving heritage assets and the impacts identified by Mr Brady, Mrs Bradley affords great weight to the harmful impact of the appeal proposal on the designated heritage assets.

7.114 *Quality of design*: Mrs Bradley attaches considerable weight to this harm recognising that some elements of the scheme are high quality but that overall the scheme does not achieve a high quality design.

7.115 *Water resources*: The Council's original position in relation to water resources was set out within a Water Resources Position Statement.[70] This confirmed that the proposal exceeds the requirements of Local Plan Policy CC/4; Water Efficiency and meets the requirements of Local Plan Policy CC/7: Water Quality.

7.116 During the Inquiry, prior to the roundtable sessions in respect of water resources, the Council submitted an Updated Position Statement in respect of water resources.[71] This advised that the Council was seeking to resolve the EA's broad objection to further development in the Greater Cambridge Area based upon the likely deterioration of water quality. The Council, together with Cambridge City Council and the Mayor of the Cambridgeshire and Peterborough Combined Authority wrote to Ministers seeking commitments from the government to the urgent resolution of the EA's position. This included a number of supply interventions that would significantly increase the water supply, the need for further modelling, and a need to identify a robust, effective and deliverable local 'policy' response for the short and longer term.

7.117 The Council explained that it is taking a cautious approach in respect of this strategic issue, noting the high level of concern. It hopes that in the coming months, the EA's objection to further development in the Greater Cambridge area would be resolved through continued work with all parties, including Cambridge Water and DEFRA. The Council has sought the Government's commitment to secure resolution of the current uncertain environmental risks by way of several workstreams, including the completion of further modelling to understand the cumulative effects of new planned development. The EA indicated that the strategic modelling work being undertaken by Cambridge Water is now underway. The Council considers that this work would enable the confident assessment of the impact of relevant planning proposals on water resources. The Council will continue to take a precautionary approach on the assessment of significant planning applications for residential and commercial developments and their impacts upon the environment in Greater Cambridge.

7.118 For the avoidance of doubt, the Council does not raise an objection in relation to water resources and Mrs Bradley did not take any issue with the appellant 's interpretation of the relevant policies. Nevertheless, Mrs Bradley attached moderate weight to the Environment Agency's intervention.

7.119 The Council submitted further comments following the results of the modelling from the EA.[72] This states that the normal approach to planning for necessary water supply at a strategic level does not apply in this instance, and that a plan-led approach should be applied. The Council considers that applying Policy CC/4 and Policy CC/7 requires regard to be had to water stress and the

[70] CD9.12
[71] ID 1.04
[72] ID 1.34

related WRMP and the Regional Water Resources Plan produced by Water Resources East (WRE).

7.120 The Council maintains its position that moderate weight should be attached to the EA's representation. It also maintains its position of not raising an objection in relation to water resources. In considering the environmental, social and economic impacts of new development proposals, the decision-maker will need to be satisfied that all reasonable steps have been taken to ensure the impact on water resources has been minimised. This includes whether it would be appropriate, alongside the water efficiency measures to be secured through final draft planning conditions to:

1. Manage the additional demand on water resources arising from the development proposals, by delaying the occupation of development until 2032.

2. Link the development to the delivery and operation of the specific strategic water supply intervention measures necessary to deliver water supplies to the region, as identified in an approved Regional WRMP and/or CW WRMP.

7.121 The Council is currently exploring a range of other options to respond to the supply challenges and the associated risk of environmental deterioration of water bodies identified by the EA in their objection. These include consideration of wider demand management measures alongside options for mitigating the risks of deterioration of water courses caused by water abstraction.

7.122 It is noted that the appellant has proposed a condition in relation to water. It is a matter for the decision-maker to determine what conditions it is appropriate to impose on any grant of permission having regard to the relevant tests. However, the Council does not consider the distinction between the residential parts of the scheme and the commercial part of the scheme to be justified. Nor is the condition consistent with the approach the Council is taking to other applications where similar issues have been raised by the Environment Agency.

Overall planning balance

7.123 Mrs Bradley considered that the appellant had over-emphasised various benefits, including economic need, high quality architecture and the efficient use of land. In her view, the appeal proposal does not represent sustainable development, and fails to address social and environmental objectives to support strong, vibrant and healthy communities or to protect the natural and historic environment. In her view, landscape and visual impacts and harm to heritage assets, taken together with the judgement that the scheme does not result in a well-designed sense of place, weigh heavily against the appeal proposal. In Mrs Bradley's view, the appeal scheme is in conflict with the development plan, taken as a whole.

7.124 In summary, Mrs Bradley firmly acknowledged the importance of the life sciences sector in Cambridge. She noted that she had led on similar strategic sites including the Wellcome Genome Campus, West Cambridge University Campus and the Fulbourn Road extension, all of which make significant provision for life sciences. However, her view was that the quantum of development, as designed, was not right.

7.125 Overall, the weight of material planning considerations must be assessed, and the numerous economic, social and environmental benefits are outweighed by the identified social and environmental harms. The proposal should be determined in accordance with the development plan, material considerations do not indicate otherwise.

7.126 Mr Brady considers that the level of harm to the designated heritage assets would be less than substantial – moderate. The public benefits of the proposal, when weighed against the less than substantial harm to the designated heritage assets, do not outweigh the resultant harm.

7.127 The Council acknowledges the recent WMS but advises that it is still waiting for clarity around how the Government proposes to deliver the quantum of new homes referred to in the WMS, and the governance arrangements for delivering the Cambridge 2040 vision. In the absence of this detail, the Council considers that limited weight should be given to the WMS.

7.128 For the reasons given, the Inspector is invited to recommend that the appeal is dismissed.

8 The case for Cambridge Past Present and Future

8.1 This summary contains all material points in relation to the CPPF's case and it is substantially based upon the closing submissions of CPPF. It is also taken from the evidence given on behalf of the CPPF.

8.2 CPPF's case against this development has centred, not on the principle, but on design and specifically the design of the buildings on the eastern edge. The development of this site would create a new edge to the city and that it is vital that it is designed to make a positive contribution to the special visual characteristics of Cambridge. Furthermore, it is important to recognise that the development would not only to be enjoyed by the residents and employees of the development, but also the tens of thousands of people who use the River Cam and the meadows.

8.3 The new urban edge needs to include a variety of architecture and of building heights and a screen of mature trees. CPPF consider that Cambridge's distinctive skyline is characterised by variety, including towers, turrets, chimneys and spires set amongst large trees. They disagree that it is characterised by long horizontal buildings as set out by Mr Ludewig.

8.4 The appeal site differs from other new developments on the edge of Cambridge because it overlooks two Conservation Areas and a significant public open space whose character is defined by the landscape.

8.5 The massing and design of the proposed development creates large square blocks of uniform height. That the articulation of the roof and elevations, and the gaps between buildings are not discernible from a distance, would create the appearance of a wall of development when viewed from the meadows. CPPF disagree that using materials, light and shade to break up the bulk of the buildings is successful. Mr Smith's proof of evidence *Drawing CN-041* clearly shows that it is not successful.

8.6 To enhance the soft green edge to the city, a screen of mature trees is needed. CPPF consider that sufficient space needs to be given to allow the trees to grow to full maturity. Mr Myers, in his evidence, confirmed that there was insufficient space to do this, that the trees would be pruned to keep them at medium size and that the purpose of the trees was not to screen the buildings.

8.7 The NPPF 2023 has placed the delivery of beautiful places at the centre of national policy. As well as being well designed, healthy and safe, places have also to be beautiful. CPPF do not consider that the proposed development is beautiful. The national requirement is therefore to deliver buildings and places which not only function well but are also aesthetically pleasing. They contend that the bulk, lack of architectural variety and the continuous built frontage along the eastern elevation will not be aesthetically pleasing. We contend that this is already evidenced by the Novotel Building and One Cambridge Square.

8.8 In conclusion, given the large numbers of people who benefit from their enjoyment of the river corridor and meadows, CPPF do not believe that the harm to the landscape, views and the setting of the Conservation Areas would be outweighed by the benefits of the development, and it should be refused. Instead, CPPF would very much welcome a new development to come forward

on this site that is design-led, respects the meadows and conservation areas, and which would create a new city edge that the city can be proud of for generations to come.

9 The case for the Environment Agency

9.1 The EA made representations before and during the Inquiry, and further comments following the modelling carried out by CW.[73] Following the representations dated 6 October, I sought further clarification on a number of points. This section summarises those comments, including the EA's final position.[74]

9.2 The EA objects to the proposed development, as it may, through the additional demand for potable water use, increase abstraction and risk deterioration to water bodies in the Greater Cambridge area.

9.3 The EA submits that the planning application does not demonstrate that the potential impact on water resources and Water Framework Directive environmental objectives has been assessed and appropriate mitigation considered.

9.4 Some water bodies in East Anglia are at risk of ecological deterioration if abstraction increases within the licensed headroom. The upper River Cam and River Granta are examples of surface water catchments where river flows are failing to support Good Ecological Status/Potential and there is a risk of deterioration should abstraction increase above historic levels.

9.5 The Environment Agency issued abstraction licence capping to CW to manage the risk of ecological deterioration. This means that there is less licensed water available than that reflected in the Water Resource Management Plan 2019 (WRMP19) for CW. Consequently, some of the growth included in local plans based on WRMP19 may be reliant on unsustainable sources of water, because the water abstracted and used for growth risks causing environmental harm.

9.6 Both the EA and the local planning authority must have regard to the risk of deterioration when exercising their functions under Regulation 33 of the WFD Regulations. Currently the application does not demonstrate the risk posed by the development has been sufficiently assessed or mitigated accounting for the impact of the licence capping on water supply.

9.7 The EA recognises the efforts made by the appellant to propose a much-improved water efficiency and reuse scheme than that proposed in the original planning application submission. It acknowledges that when the water efficiency measures and greywater recycling are combined, they propose a water use standard that exceeds the requirements of Local Plan Policy CC/4.

9.8 The water that was thought to be available at the time the South Cambridgeshire Local Plan and Cambridgeshire City Local Plan were adopted in 2018 (based on the current WRMP19), is now not something that can be relied upon. Neither the EA, nor the Local Planning Authority can ignore or postpone, consideration of this matter that is, to consider only as part of the emerging Local Plan, especially given the potential risk of harm to the ecology of water bodies. Local Planning Authorities and the Agency have a legal duty to have

[73] CD 3.03B, CD 3.03C, CD 13
[74] ID 1.33 & ID1.34

regard to RBMPs in exercising their public duties under Regulation 33 of the Water Environment (WFD) Regulations (2017).

9.9 The PPG reinforces the premise that planning for the necessary water supply would normally be addressed through strategic policies, which can be reflected in water companies' WRMPs. It goes on to state 'water supply is therefore unlikely to be a consideration for most planning applications' and lists some exceptions. One of those exceptions is "where a plan requires enhanced water efficiency in new developments as part of a strategy to manage water demand locally and help deliver new development." The EA's view is that this exception applies to the situation in Greater Cambridge.

9.10 The EA created a draft external briefing note for applicants with proposals accompanied by Environmental Impact Assessments entitled *'Greater Cambridge external guidance note for planning applications - Drafted by Environment Agency, March 2023*' (see Appendix 2). Greater Cambridge Shared Planning (GCP) suggested we create such a guidance note so that consistent advice could be shared on how water resources is to be assessed as part of the Environmental Statement and advice on mitigation.

9.11 There are 27 surface waterbodies identified as being affected by CW abstraction. The hydrological regime in 12 of these water bodies does not support good ecological status. Measures have been established to address both the deficits in flows and the risk of deterioration through the Water Industry National Environment Programme (WINEP) and through the process of abstraction licence renewal.

9.12 Good quantitative groundwater status requires that the level of groundwater should not lead to any reduction in the ecological status of connected surface waters or in groundwater-dependent terrestrial ecosystems. Where there is a flow deficit, the EA looks at which abstractions are potentially causing that deficit to occur and also for additional evidence that there is an impact or, there is potential for impact to the ecology. Macroinvertebrates are commonly used as bio-indicators of flow pressure, due to a good understanding of the ecological requirements of different families / species and available metrics that summarise the sensitivity of taxa to such impacts.

9.13 A number of SSSIs were investigated under the Restoring Sustainable Abstraction (RSA) programme which make up the Groundwater Dependant Terrestrial Habitats (GWTE) assessment of the WFD Groundwater quantitative status. In the case of Alder Carr SSSI, it was found that any increase to historic abstraction has the potential to worsen impact at this site.

9.14 In the case of Dernford Fen and Sawston Hall Meadows SSSIs, CW provided reassurances in its draft drought plan 2017 that it did not plan to increase abstraction from the licences near the SSSI above the historical quantities and would use other licences preferentially during periods of drought. The EA consider that there is a risk to the SSSI should this no longer be followed, and abstraction increased to fully licensed rates.

9.15 Thriplow Peat Holes; Thriplow Meadows; Ashwell Springs; Fowlmere Watercress Beds; and Fulbourn Fen SSSIs all depend on augmentation from Agency run groundwater support schemes to mitigate against the impact that CW's

abstractions have on the groundwater levels and corresponding spring flows that feed the SSSIs. There is a deterioration risk that increasing licensed abstraction rates will reduce the capacity of the EA's groundwater schemes to provide adequate mitigation to the SSSIs, particularly considering the possible additional impacts of climate change.

9.16 At Wilbraham Fen SSSI, mitigation measures have been identified to better retain water on site but have to date not been implemented. There is a risk of deterioration to the water levels on site should abstraction levels increase above historic rates, especially considering mitigation measures are yet to be implemented.

9.17 The outputs from CW scenario modelling conclude that there are surface water bodies where there is a 'medium' or 'high' risk of deterioration associated with the level of abstraction CW is required to make to meet the demands of existing customers and projected growth, including the appellant's development, until the Grafham transfer option is available.

9.18 CW demand management measures include the rollout of universal smart metering (2025-2030), 50% reduction in leakage by 2050, achieving a per capita consumption rate of 110 litres per person per day by 2050, and reductions in non-household consumption of 9% by 2037. However, the EA currently does not have clarity as to how water savings that are made from these measures will offset the demand from the appellant's scheme or other developments.

9.19 Further, the EA has concerns that the draft WRMP24 proposed supply options are not developed sufficiently to have confidence in their deliverability. Nor is there an alternative solution should the bulk transfer from Anglian Water and/or the Fens Reservoir scheme be unfeasible or delayed.

9.20 *The Greater Cambridge Integrated Water Management Study (Outline Water Cycle Study)* dated August 2021 paragraph 9.1.3 states:

"*For water supply, currently permitted abstraction of the Chalk aquifer is having a detrimental impact on environmental conditions, particularly during dry years. Even without any further growth, significant environmental improvements are unlikely to be achievable until major new water supply infrastructure is operational, which is unlikely to occur before the mid-2030s. To prevent any increase in abstraction and its associated detrimental environmental impact before the 2030s, short term mitigation measures will be necessary. All stakeholders agree this should include ambitious targets for water efficiency in new development but there are also options to deliver new water locally which will be set out in the detailed study.*"

9.21 Whilst the individual demand forecast required for this development represents a small percentage of CW's overall demand, the Agency's position remains that it has not been demonstrated that the water demands aren't significant locally at the point of abstraction from where that demand is serviced.

9.22 Specific water bodies where abstraction is contributing to ecological pressure and/or is predicted to cause a risk of deterioration have been identified. "*Water Resources and Ecological Evidence Summary*" sets out the Agency's evidence

regarding the risk of deterioration under the WFD and its relevance to this appeal.[75] Waterbodies on the Rivers Cam and Granta are already impacted by abstraction. On the basis of the evidence, it is predicted that any increase in abstraction (including servicing this development) will result in an increase on the existing pressure and an extension of its impact to include abstraction from other water bodies utilised by CW.

9.23 The modelling concludes that even with no new development, the associated increased demands for abstraction (above the licence cap level) result in a 'medium' deterioration risk for one surface water body (SWB) - the River Granta, which is a material consideration in this case. With planned growth projections introduced, the risk increases significantly concluding that there is a 'medium' to 'high' risk of deterioration for six SWBs until 2032 when the Grafham Reservoir transfer is due to be operational.

9.24 Waterbody deterioration is measured relative to the starting conditions, which for some SWBs means that the flows do not presently meet the hydrological flow targets that support Good Ecological Status. Therefore 'low' or 'no' deterioration risk does not automatically mean that there are no current flow/abstraction related pressures on the SWBs, just that there is forecast to be no/low risk of these getting worse (deteriorating).

9.25 The deterioration risk assessment is separate to the consideration of CW's ability to supply existing and future customers without going into deficit within its WRMP. The work has highlighted the potential deficits in the balance of supplies and demands until new strategic resources are available.

9.26 The EA's review of the CW's scenario modelling is found at ID 1.33. The original scope of the modelling was to help inform GCP's cumulative assessment of growth in its emerging local plan.

9.27 The EA's assessment is based on a high-level review of the outputs in the time available, attributed to CW's delayed and piecemeal provision of modelled outputs. As a result, the views presented in this representation are without prejudice to alternative or revised opinions being formed subsequently, further to a more comprehensive assessment of this evidence and may change further following the review of CW's revised draft WRMP2024.

9.28 The EA contends that the growth scenario work evidences that CW will not be in a position to reduce abstraction to the licence cap level until after the Grafham transfer supply option is delivered. CW are wholly reliant on demand management measures to increase water available to supply growth until the Grafham Reservoir transfer, due in 2032.

9.29 The modelling considered a number of scenarios. The EA focused their assessment on the '*WRMP2030 (S27)'* scenario. This assumes 100% delivery and success of its planned demand measures. The EA states that the results could be over or underestimating the likely level of abstraction.

[75] CD13.01

9.30 It is considered that this scenario is the best available representation of forecast levels of abstraction by CW and assumes 100% delivery and success of its planned demand management measures. It also makes assumptions about other water companies and other sectors' abstraction at the 2030 timestep.

9.31 CW presently has obligations to deliver licence caps to most of its licences by 31 March 2030. While the licence caps do not come into force until 2030, abstraction levels would exceed the capped levels before this date, and in some cases, they are being exceeded already. This means the deterioration risk is immediate.

9.32 The scenario modelling has identified those SWBs with the greatest risk of deterioration. '*Medium'* and '*High'* levels of risk indicate an unacceptable level of risk of deterioration under the WFD, and where there is also growth in abstraction planned, trigger the setting of licence caps to restrict annual average abstraction to its recent actual average level.

9.33 To reduce the risk, the amount of overall growth in Cambridgeshire would need to be reduced, or the amount of water it needs would need to be reduced. This can be achieved through later delivery of phases of developments (pushing more phases to post 2032 occupation) as far as possible. It can also be achieved through greater water efficiency of developments.

9.34 The forecast level of abstraction until 2032 (scenario 'WRMP 2030 (S27)') poses a significant (high or medium) risk of deterioration. Growth will add to this risk unless new supply is found. CW relies on demand management to free up supply for growth until 2032. However, their performance in delivering demand management in recent years is poor.

9.35 Both of the underlying chalk groundwater bodies from which CW abstract water, currently have a WFD status of Poor. This indicates that the groundwater is not providing enough water to the surface water bodies and features that depend on them for baseflow at historical levels of abstraction.

10 The case for others at the Inquiry

Cambridgeshire County Council Transport[76]

10.1 Cambridgeshire County Council is the local Highway Authority for the area. As set out in the SoCG there are no matters in dispute between the parties.[77]

10.2 Cambridge County Council supports development as long as the transport infrastructure that supports it is in place to enable the very low car drive mode share. It therefore seeks the contribution to strategic and local transport, that is made by the appellant, in order to ensure that strategic transport infrastructure is implemented. This is in order to mitigate the impact of the development related trips on the surrounding transport network.

10.3 It is recognised that if sufficient funding is not secured, then it would compromise the wider comprehensive development of the area as sought through the Local Plan. The failure to secure sufficient funding through developer contributions will not allow sufficient transport intervention to be implemented such that the traffic impact for the area as a whole can be mitigated.

Mike Bodkin on behalf of Hartree, Anglian Water and Cambridge City Council. [78]

10.4 Mr Bodkin represented the developers for the landowners of the Core Site within the NECAAP, namely Hartree, Anglian Water and Cambridge City Council.

10.5 The Core Site includes land currently occupied by the existing CWWTP and is proposed to deliver 5,500 out of 8,350 residential units. Redevelopment of the Core Site is predicated upon the relocation of the existing CWWTP to a proposed new site at Honey Hill on the outskirts of Cambridge. A DCO seeking to enable the relocation was submitted in April 2023 and the Examination opened on 17 October 2023.

10.6 As set out at Policy SS/4, developments that come forward in advance of the adoption of the NECAAP should "*…not compromise opportunities for the redevelopment of the wider area*". Such considerations are not confined to infrastructure contributions.

10.7 Mr Bodkin contends that the Typologies Study and Development Capacity Assessment, (December 2021) indicates that the plots forming part of the appeal site should deliver a total of 730 homes, rather than the 425 proposed.[79]

10.8 The emerging NECAAP seeks to cap the level of BtR across NECAAP at 10% of development. If the higher proportion of BtR is allowed, there is concern that the level of BtR on the Core Site would be reduced in order to maintain the level of BtR at 10% across the NECAAP. Should this happen, it would further hamper

[76] CD 3.09
[77] CD 6.13
[78] Mr Bodkin's speaking notes are at ID1.11
[79] CD 5.33

the ability of the Chesterton Partnership to deliver a balanced and equitable housing market on the Core Site.

10.9 A reduction in the number of market homes overall would also mean fewer affordable units being delivered. Similarly, the proportion of affordable units delivered via BtR would be lower. This would exacerbate the housing crisis currently experienced in the City.

10.10 The Chesterton Partnership therefore considers that the appeal proposals do not demonstrate that they would "*... not compromise opportunities for the redevelopment of the wider area.*"

10.11 The emerging NEC Infrastructure Delivery Plan should be the vehicle for identifying what is needed to support growth of the NECAAP as a whole. The Chesterton Partnership is concerned that those developments that come later in the process would have to pick up additional infrastructure costs such as utilities or highways. This would be unfair and disproportionate. It would also threaten the viability of later developments, such as the Core Site, and may compromise opportunities for the wider redevelopment of the area;

10.12 The emerging Heads of Terms for the s.106, as agreed between the appellants and the LPA, do not mirror the draft Infrastructure Delivery Plan (IDP) or the level of contributions that would be expected to be required from the appeal site if the NEC/IDP were adopted.

Chesterton Partnership comments on Draft Heads of Terms S106[80]

10.13 The draft IDP states "*On a per dwelling basis the full build-out contribution is £28,868, and for the commercial element £201/ sq m.*"[81] Applying those rates to the levels of development proposed would yield a total contribution of c£23.2m for the quanta of development in the appeal proposal.

10.14 The maximum level of contributions to be provided by the appellant is about £3.15m compared to £23.2m which would have been sought had the NECAAP and IDP been adopted. Of this £1.62m is only payable towards strategic transport infrastructure should the trip budget be exceeded.

10.15 This gives rise to concerns that later developments across the NECAAP area would have to contribute a greater sum proportionately, thereby threatening their viability, and the proposal would fail to make an adequate contribution to provide for infrastructure to support the growth proposed.

10.16 To take one issue in particular, no sum has been sought towards the upgrade of power supplies to NEC via the Milton Road Primary Substation. A sum of £3.5m is identified in the draft IDP. The lack of power supplies is an absolute constraint to development, which would fall disproportionately on developments which come later.

[80] ID1.12
[81] CD 5.21

10.17 If the IDP costs are subsequently intended to be simply re-distributed in a 'post-AAP-adopted' world, this would be an inequitable, unviable, and flawed approach that would not deliver the comprehensive, residential-led mixed use district that the Local Planning Authorities and other stakeholders are envisaging. Very limited contributions have been sought towards the range of infrastructure items falling within the utilities theme in the draft IDP.

10.18 40% of the market sale units would be affordable, together with 20% of the BtR units. Therefore a total of 116 units out of 425 would be affordable, or 27%. Policy H/10 of the SCLP seeks 40% of the homes on site as affordable. The corollary of under provision of affordable housing on sites such as the appeal site would be that additional affordable housing would be sought on sites coming later, such as the Core Site.

Kathryn Waldren of Sphere 25 on behalf of Trinity College Cambridge

10.19 Trinity College made the following points of clarification in relation to transport matters and Cambridge Science Park.

- Cambridge Science Park (CSP) is subject to a S106 dated 20 December 2019. (Planning Reference: S/4629/18/FL)
- The S106 limits car parking on CSP to 7,498 car parking spaces.
- The S106 covenants Trinity College Cambridge as the owner to use 'reasonable endeavours' to reduce the car parking to 6,977 spaces by the 20 December 2029.
- The NECAAP is at an early stage of development and the Trip Budget and parking assumptions are yet to be tested through Examination in Public.
- Trinity College and CSP are continuing to engage with the NECAAP team that are developing the strategy.
- Trinity College and CSP are supportive of the approach that would see continued investment in sustainable travel for the area.
- There are outstanding concerns regarding the Trip Budget derivation and allocation and potential to reduce car parking across CSP below that are set out in the s106.

Susan O'Connor

10.20 Mrs O'Connor is concerned that she would be overlooked by the proposed development, including when in her bedroom.

Councillor Hazel Smith Parish Councillor Milton Council

10.21 Many of those resident on the traveller sites along Fen Road have lived there for many years. In some instances since the 1960's. They own the land and benefit from planning permission. They would like to see some benefits from the NECAAP.

10.22 There are about 500 properties/caravans and would like to see the crossing gates replaced with a bridge, as well as a connection to the sewage system.

10.23 Councillor Smith considered that the edge of the proposal was high and requested that it should be stepped down towards the boundary.

11 Written Representations

Cambridge Fire and Rescue Services

11.1 The Fire Authority would ask that adequate provision be made for fire hydrants, which may be by way of a s106 agreement or a planning condition.

Natural England[82]

11.2 The proposal is accompanied by a *Low Emission Strategy* (Brookgate Land Limited, April 2022).[83] NE is satisfied that subject to development in accordance with this strategy being secured through an appropriate planning mechanism, the proposed development is unlikely to give rise to significant traffic-related air quality impacts.

11.3 NE also accepts the proposed delivery of informal open space including the Wild Park, could provide an adequate level of accessible open space to meet the needs of new residents and minimise recreational pressure on existing sensitive sites. On this basis, NE has no objection to the proposed development with regard to air quality and green infrastructure.

11.4 Evidence gathered to inform the Integrated Water Management Study for the emerging Local Plan indicates that groundwater abstraction from the Cambridge aquifer, to meet current needs, is already damaging the natural environment including water dependent designated sites and supporting habitats. The emerging Local Plan (First Proposals) recognises the challenges in identifying long-term and interim solutions to the current water resource crisis to enable sustainable development without further detriment to the natural environment.

11.5 There needs to be consideration as to whether water resources to meet the needs of the proposed development alone, and in-combination with other proposed development, can currently be supplied sustainably and without adverse impact to statutorily designated sites and wider ecology, in accordance with the relevant policies of the adopted South Cambridgeshire Local Plan including Policy CC/7: Water Quality.

11.6 It is now widely accepted that East Anglia, and particularly Greater Cambridge, is facing a 'water crisis' due to over-abstraction of the groundwater resource that is the life-support of water dependent designated sites and other important habitats. There is significant uncertainty around the availability of water supply to meet growth needs without contributing to environmental deterioration until alternative supply options can be identified and implemented.

11.7 The water crisis has now reached a potential 'tipping point'. NE's view is that careful consideration is required as to whether any major new development can be delivered sustainably and without contributing further environmental degradation until alternative water supply sources and/or measures to reduce further groundwater abstraction become available.

[82] ID 1.10
[83] CD 1.56

11.8 NE's detailed concerns are set out in its responses to the Greater Cambridge Local Plan Integrated Water Management Study, the Local Plan First Proposals consultation and the Cambridge Water draft WRMP2024.

11.9 NE is gathering information to evidence the ecological implications of existing abstractions (and potential future increases). This issue, and the seriousness of the matter in terms of its geographical extent and risks to the natural environment, has only recently come to the fore. The urgency of the situation cannot afford the timespan required to gather empirical evidence hence yje need to be guided by the evidence currently available through NE, the EA and others.

11.10 Further detailed investigation by the water companies is required to determine the impacts that are already occurring and the effects of any potential future increases in abstraction on the notified features of our nationally designated sites. The full suite of designated sites potentially affected is still not fully understood and requires investigation through the IWMS. The EA has evidence that water bodies across Greater Cambridge are being affected by the abstraction of groundwater. Its investigations have identified a number of water bodies where flows are failing to meet their ecological flow targets due to abstraction and that the ecology is sensitive to flow and abstraction in some water bodies, for example the River Granta and River Cam.

11.11 The EA also indicate that there is wider evidence of abstraction pressure on Chalk streams, river headwaters and spring flows, groundwater dependent wetlands and reduced resilience to dry weather and drought events, and that there is a risk of compounding these abstraction pressures and potential ecological deterioration if abstraction increases.

11.12 The health of these affected waterbodies is fundamental to the maintenance of the favourable condition of the designated groundwater-dependent SSSIs. The link between groundwater abstraction, reduced flows and impacts to designated sites is therefore quite clear. For this reason, we fully support the EA's view that action is needed to prevent environmental deterioration occurring by ensuring abstraction does not increase.

11.13 Reductions in the current level of abstraction from the Cambridge aquifer is the key mitigation needed to restore the natural functioning (both water flows and chemistry) of nationally designated groundwater dependent sites across Greater Cambridge, and elsewhere. Temporary measures, such as groundwater support or re-charge schemes, to introduce 'wetness' to these sites, offer some interim benefit. However, these are not long-term sustainable solutions and NE does not support them.

Anglian Water[84]

11.14 The foul drainage from this development is in the catchment of Cambridge Water Recycling Centre which currently does not have capacity to treat the flows from the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would

[84] CD 3.05

therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

11.15 The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to a sewer seen as the last option.

Sport England[85]

11.16 On the basis of a population increase of 732, a contribution of £299,762 can be justified in order to enhance existing sports facilities in the locality.

National Highways[86]

11.17 The network in the vicinity of the NECAAP area close to the A14 is extremely saturated on both the local highway network and the Strategic Road Network. A technical note provided by PJA sets out the principles of a monitor and manage approach to be applied to the proposal.[87] This is acceptable in principle.

11.18 The potential mitigation measures could reduce the number of vehicle trips to the application site. However, if there are persistent breaches, National Highways may require a mitigation plan outlining improvements to junction 33 of the A14 Milton interchange to accommodate the additional capacity related to the development and seeking a financial contribution towards the improvements. The contribution is to ensure that the risk of queuing traffic down the slip roads to the main line is mitigated as this risks a safety issue. This may require additional monitoring in relation to the impact of the proposal on the Strategic Road Network. A number of planning conditions were recommended by National Highways. These matters are addressed by the s106 agreement.

Milton Parish Council [88]

11.19 The proposal is an overdevelopment of the site. Milton Parish Council has concerns over the density and height of the development and lack of amenities such as recreational and informal space.

Cambridge Airport[89]

11.20 Cambridge Airport requested that the boundary to the balancing pond include '*Phragmites austrlis'*. The appellant has complied with this request.

11.21 Cambridge Airport also requested conditions requiring the submission of a Bird Hazard Management Plan, a glint and glare assessment in relation to PV panels and a height limitation in respect of the outline consent. These matters are all included in the recommended conditions.

[85] CD 3.06B
[86] CD 3.10
[87] CD 6.11 Appendix 1
[88] CD 3.11A
[89] CD 3.12

Cambridgeshire Police[90]

11.22 Various general comments in relation to crime prevention, including access and movement, security and surveillance.

Cambridge City Council Environmental Health[91]

11.23 Cambridge City Council has considered the impact on local air quality within the City Council boundary and in particular inside the Air Quality Management Area (AQMA). This impact is most likely to be in response to increased traffic movements.

11.24 The modelling within the ES confirms that pollutants remain below objective levels and air quality is not a constraint to development. Whilst this conclusion is supported, policy is seeing a shift away from limit values towards exposure reduction and limiting the impact of development.

11.25 The modelling predicts that the operational phase of the development would have an adverse impact on air quality within the Cambridge City Council AQMA. This is contrary to Policy 36 of the Cambridge City Local Plan (2018). The proposed mitigation, namely 4 Car Club spaces and a commitment to active electric vehicle charge points (EVCP's) in all commercial and residential car parking spaces, is acceptable and should be secured by condition. This condition has been included.

11.26 A condition requiring submission and approval of a detailed Construction Environmental Management Plan (CEMP) prior to the commencement of development to control, manage and mitigate construction noise, vibration and dust for the duration of the construction activities is necessary to safeguard residents. This condition has been included.

11.27 It is unlikely that there would be any significant operational noise impacts within the Cambridge City boundary. Given the proposed development on the western boundary of the site adjacent to existing receptor locations within the Cambridge City boundary, the impacts of artificial lighting may have an adverse impact at those locations, albeit possibly low risk when considering the separation distance.

Mineral and Waste Planning Authority[92]

11.28 The Mineral and Waste Planning Authority state that it is broadly content with the conclusions of the dust and odour reports. It nonetheless had outstanding concerns regarding the interaction between the proposed Use Class E uses and, the Aggregates Railhead.

[90] CD 3.13A
[91] CD 3.15
[92] CD 3.18

Historic England[93]

11.29 Historic England contends that the proposed development would harm the significance of Biggin Abbey, the Stourbridge Common and Fen Ditton Conservation Areas and more generally, compromise the important relationship between Cambridge City and the surrounding countryside.

11.30 The RSSCA is a large conservation area. Its frontages and towpaths along with the characteristic green open spaces are a key element of how the conservation area is experienced and appreciated. It abuts FDCA with which it forms a linear "*green corridor*" which penetrates the city east to west, bringing the countryside into the heart of the busy city.

11.31 The FDCA includes the historic core of Fen Ditton village is set on rising ground to the east of the River Cam valley. The principal historic building is the parish church of St Mary the Virgin (Grade I listed) with a landmark west tower. The church stands at the junction of High Street and Church Street. To the west of the church is Fen Ditton Hall, the substantial relic of a once larger Jacobean House (Grade II*). Fen Ditton is separated from Cambridge by Ditton Meadows and Stourbridge Common, which occupies the land to the east of the Cam. Although modern development can be seen on the edges of the common, it is small in scale, and the scale of open landscape survives. Ditton Fields along with the other sequence of common land and open spaces contributes to the distinctive relationship between town and country, which is an attractive part of Cambridge's historic character.

11.32 Baits Bite Conservation Area abuts the north end of FDCA and is characterised by water meadows with drains and open fenland in agricultural use. It includes the river on its western side and the lock, which is listed at Grade II. The 14th century farmhouse known as Biggin Abbey lies on the eastern side of the conservation area. It was part of the Bishop of Ely's residence and the site was originally moated. It sits on elevated ground allowing long views across to the west and south, and is Grade II* listed.

11.33 These conservation areas adjoin to form a continuous chain, which reaches from just south of Milton to the City Centre. The river, towpaths and fields are very well used by runners, rowers, cyclists and walkers alike and the designation is recognition that the riverside meadowland spaces are an important component of the historic character of the city and its environs.

11.34 The proposal is broadly in conformity with the policy and that this lends a certain amount of weight in its favour. Notwithstanding this, there are concerns in terms of the impact that the proposed development would have upon the historic environment.

11.35 The proposed buildings range from 14 metres up to a maximum of 30 metres with an additional 3 to 4.5 metres in height for rooftop plant. The buildings would have a solid, block-like appearance, which would compound the visual impact.

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[93] CD 3.20

11.36 Building S04 would exceed the heights that are benchmarked in the NECAAP. Historic England is not convinced that this height increase is necessary or justified and should be revised.

11.37 The development would appear as more than mere brief glimpses through gaps and above treetops. It would be readily visible and feature prominently within some of the more rural views across the river, and meadowland. Consequently, the proposed buildings would bolster and consolidate the sense of a strident, urban sprawl within what has historically been a low-lying hinterland. The proposal would constitute a permanent change to the visual quality of the wider setting of these heritage assets and would have a negative effect upon the way in which they are experienced and appreciated.

11.38 Whilst landscaping may be successful in helping to soften the appearance of the development in local townscape terms, it would not be very effective in mitigating the visual effects of the development in terms of long-views, due to the scale of these buildings. It is also questioned whether there is in fact sufficient space for planting along the eastern boundary with the railway track.

11.39 The view from the termination of Coronation Avenue at Anglesey Abbey has not been fully assessed. The wider panoramic vista from the end of the Avenue may be interrupted by views of taller buildings.

11.40 In conclusion, the scale and massing of the proposed development would result in profound changes to the wider setting of designated heritage assets, most notably the riverside conservation areas which make a positive contribution to the visual quality and historic character of the city.

11.41 The proposed development would result in an overall moderate level of less than substantial harm to the significance of Fen Ditton, Baits Bite Lock and Riverside and Stourbridge Common Conservation Areas, and Historic England object to the development in its present form.

Lead Local Flood Authority[94]

11.42 Surface water from the proposed development can be managed through the use of green roofs on all flat roof areas and areas of permeable paving provided in some areas of pedestrian access. A swale is proposed within the eastern part of the site and a proposed attenuation basin to the north. A rainwater harvesting tank is proposed in the north to assist with water management. Water would be discharged at the agreed rates of 2 l/s/ha from the site into the overflow from the First Public Drain, which carries water to the east towards the River Cam.

11.43 In further submissions, in the form of the Technical Note, it has been demonstrated that the system can be designed to accommodate the full 40% uplift for climate change allowances in the 1% Annual Exceedance Probability storm. The increased attenuation areas can be accommodated within the constraints within the site.

[94] CD 3.21

11.44 A number of conditions are suggested, including the submission of the detailed design of the drainage system, management of surface water during the construction phase and a verification report once the works are complete. Various drainage conditions have been included.

Network Rail[95]

11.45 The proposed development would form a vital part of the regeneration of the area to the north of the station, and east and west of Cowley Road.

11.46 Network Rail has worked closely with Brookgate and the Council throughout the design development process. It is committed to ensuring that this highly sustainable brownfield site is released for the delivery of a high-quality development on land currently under-utilised for employment and housing. The site offers the opportunity for a new, vibrant, sustainable, and highly connected mixed-use community and to deliver an integrated and convenient transport interchange that supports economic growth, highlighting Cambridge North as a city-wide public transport hub and destination. Therefore, Network Rail fully supports the proposals for redevelopment.

Cambridgeshire County Council Infrastructure Contributions[96]

11.47 The County Council seek financial contributions towards Early Years, Secondary Education, SEND, library services and household recycling. These matters are considered at Section 12 of this Report.

NHS Cambridgeshire and Peterborough[97]

11.48 The proposal would sit within the catchment area for Nuffield Road Medical Centre. As of August 2022, this practice list was 14,193 so would not have the estate capacity to support an additional 1,190 new residents as a result of this development without consideration of developer mitigation towards this potential new growth, which would be calculated as £298,003.

East of England Ambulance Service[98]

11.49 The capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be £108,554.

11.50 EEAST looks forward to receiving the s106 agreement in due course to support one or more of the following elements:

- Increasing the number of ambulances required to meet the expanded demand in order to maintain contractual response times to prevent the application of contractual fines
- Extending/refurbishment of existing ambulance station(s) within the locality to meet the increased demand or in certain instances support relocation to a more suitable location

[95] CD 3.22
[96] CD 3.36 & CD 14.01B
[97] CD 2.38
[98] CD 3.29B

- Provision of additional medical equipment to manage the increased number of incidents from the growing population in order to maintain mandated ambulance response times and treatment outcomes
- Recruiting, training and providing new equipment for additional Community First Responders (CFRs) to support the proposed development and the community as a whole
- Use of digital solutions.

Fen Ditton Parish Council[99]

11.51 Fen Ditton Parish Council recognises that the proposed uses are in broad accordance with the Council's aspirations for this location and have no objection in principle to the proposed redevelopment. However, the proposals comprise over-development of the site and by virtue of their height, massing and poor quality of architecture would have an unacceptable impact upon their surrounds and particularly the parish of Fen Ditton, including the Conservation Area and a number of listed buildings including the setting of the Grade II* St Mary the Virgin parish church.

11.52 Fen Ditton Parish Council previously raised objections to the Novotel at Cambridge North due to its height, massing, light pollution and poor quality design. This has been borne out by its construction with the hotel an oppressive, highly visual and unattractive element viewed from Fen Ditton with a further larger building under construction to the rear.

11.53 However, the appeal proposals would have a significantly greater unacceptable impact. As shown from the submitted application documentation, the proposals would exceed the height of the hotel and provide a significant massing across a far wider area. Fen Ditton Parish Council considered the height of the hotel to be unacceptable, but we are now faced with a development that takes that height as a benchmark to exceed.

11.54 The Parish Council also has concerns as to the lack of amenity space for occupants of the residential properties and those working within this location, providing an unacceptable level of residential amenity and also putting further pressure on Milton Country Park.

Mr Williams [100]

11.55 Concerned about the capacity of local infrastructure including doctors, dentists and schools. There is a need for decent bus routes to the area since the Council is going to introduce car charges. Concerns regarding the ability of the highway infrastructure to accommodate the traffic generated by the proposed development.

[99] CD 3.35
[100] CD 14.07

12 Planning Obligations

12.1 The draft s106 agreement was discussed at the Inquiry, together with the Heads of Terms and CIL Compliance Statement. Both are dated 23 May 2023.[101] The parties submitted an executed s106 agreement dated 13 July 2023.

12.2 Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010 states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development. These tests are also stated in paragraph 57 of the NPPF.

Schedule 1 Affordable Housing

12.3 The market and affordable housing would be delivered within Block B S13 - S16). 40% of it would be affordable housing in accordance with Policy H/10 of the Local Plan. The tenure mix is anticipated to be 70% rented and 30% intermediate with a mix of unit sizes.

Schedule 2 The Build to Rent Units

12.4 The BtR units would be delivered in two blocks. Within each block, 20% of the dwellings would be for affordable private rent at no more than 80% of the market rent. There would be a mix of unit sizes and they would be managed by a Private Build to Rent operator. The level of affordable housing accords with the requirements of the Greater Cambridge Housing Strategy and National Guidance. The provision of affordable housing is therefore considered fair and reasonable as the proportion advocated under the development policy. Mr Bodkin's concerns regarding the proportion of Build to Rent housing and affordable housing are discussed below.

Schedule 3: District Council Contributions and Community Uses

12.5 On-site community facilities, including a Community Room within the market and affordable housing block. The provision of on-site community facilities is directly related to the proposed development and would directly benefit the future residents of the development proposed.

12.6 A contributions to off-site sport provision, in line with Sports England and Local Plan requirements consisting of a Sports Hall contribution of £149,485 and a swimming Pool contribution of £150,277, are necessary to meet the needs of the new population in accordance with Policy SC/4.[11.16]

12.7 A meanwhile uses strategy would ensure temporary, on-site provision during construction phases to include public open space, growing areas and allotments in accordance with Policy SC/4. The provision of on-site meanwhile uses is directly related to the proposed development.

[101] CD15.01 & CD15.02

12.8 There is provision for a financial contribution of £298,003 to enhance off-site primary healthcare provision at Nuffield Road Medical Centre in accordance with the request from the NHS Cambridgeshire and Peterborough Clinical Commissioning Group. As an alternative, the Developer can, subject to agreement with the Council, market a site for a primary healthcare facility in accordance with an approved scheme.[11.16]

12.9 The s106 also provides for a per dwelling contribution towards household waste receptacles.

12.10 The schedule includes the phased delivery of car club spaces for a minimum of three years, and a bike and/or scooter hire scheme.

Schedule 4 Open Space and Biodiversity Net Gain

12.11 For each phase, a scheme would need to be approved for the delivery of the Open Space and Biodiversity Gain, which is to include a programme for its delivery.[102] In addition, the play areas outside Chesterton Gardens and the allotments are to be delivered in tandem with the residential uses.

12.12 An OpenSpace Management and Maintenance Strategy in respect of the site-wide open space, including the children's play space and allotments is required. These are all necessary to meet the needs of the new population generated by the development in accordance with Policy SC/7.

Schedule 5: Public Art

12.13 This requires a site-wide public art delivery plan and phase specific public art delivery plans. The provision of public art is directly related to the proposed development given the extensive public realm and is in accordance with Policy HQ/2 and would benefit the future occupants and users of the development proposed.

Schedule 6: Guided Busway Route Adoption

12.14 An Adoption Agreement with the County Council as Highway Authority, is required to secure the dedication and adoption of the busway route (at no expense to the owner) to ensure, so far as possible, the busway route currently used by guided buses continues to access Cambridge North station across the Site in accordance with Policy TI/2.

Schedule 7: County Council Contributions

12.15 A library contribution of £37,642 would be provided towards Arbury Court library (within a 20 minute walk of the site). It would support the library facilities necessary to meet the needs of the new population generated by the development in accordance with Policy SC/4.[11.47]

12.16 A contribution of £13,698 towards additional capacity at Milton Household Recycling Centre is required. This is directly related to the proposed

[102] ID 1.16

development and would directly benefit the future residents of the development proposed.

Schedule 8: Education

12.17 A contribution of up to £261,615 towards an off-site Early Years facility is required. Alternatively, the Developer may provide a place within the development for such use. A financial contribution of up to £118,864.35 towards secondary education is required. It would be used towards new school places at an extension to North Cambridge Academy. A financial contribution of £95,932 towards Special Education Needs and Disabilities, to be used at the Martin Bacon Academy, Northstowe is necessary. These contributions are necessary to mitigate the impact of the new population on the education system.

Schedule 9: Highways

12.18 There are a number of obligations in relation to highways, these include: delivery of the Mobility Hub and a Car Park Management Plan; delivery of an on-site wayfinding scheme; delivery of on-site crossing provision on Milton Avenue; a financial contribution towards the delivery of vehicle traps on the CGB; bus shelter extensions; the delivery of on-site provision of public transport information; and the delivery of on-site cycle routes and on-site crossing provision. These measures are all necessary in order to encourage sustainable transport and ensure that the trip budget for the site is not exceeded.

12.19 There is an obligation requiring the implementation of travel plans, including separate travel plans for each commercial building.

12.20 An obligation to monitor vehicles accessing car parking areas within the development associated with the commercial land uses and also to monitor traffic flows at Milton Interchange is necessary to ensure that vehicle trips generated by the development are within the agreed trip budget. It also allows the assessment of the impact of traffic generated by the scheme on the Milton Interchange and the establishment of a Transport Review group to consider the results of the monitoring. A contribution of up to £1.62m is to be made available to fund improvements to identified strategic transport infrastructure to remedy breaches of the trip budget in the event that the trip budget agreed in the Transport Assessment is exceeded.

12.21 A contribution of £100,000 is included for off-site works towards Cowley Road improvement and enhancement works to cycle and walking routes to and from the station. These include safety, lighting and amenity improvements. This contribution is necessary in order to encourage sustainable travel.

12.22 The location of this development and the low level of on-site car parking provision results in the need to monitor the surrounding areas in terms of local car parking to ensure the development does not result in additional on street parking in surrounding areas. A financial contribution of up to £75,000 is necessary to assist the County Council with implementing appropriate interventions, if required.

12.23 In each case I am satisfied that the planning obligations and financial contributions sought would meet the statutory tests above.

13 Recommended Planning Conditions

13.1 I have considered the planning conditions, including a number of pre-commencement conditions, that were provided and discussed in draft at the Inquiry on a without prejudice basis. These were subsequently amended and agreed between the parties.[103]

13.2 I have considered the conditions against the relevant advice given in paragraphs 55 and 56 of the NPPF and the guidance contained in the section on 'Use of Planning Conditions' in PPG. Where necessary I have amended them in the interests of clarity, precision, and enforceability. Should the Secretary of State be minded to allow the appeal, I recommend that the conditions set out in Annex D of this Report be imposed.

13.3 The conditions considered below firstly address those that apply to the entire site, followed by those applicable to the detailed application, and finally those applicable to the outline application.

13.4 A site wide phasing plan (1) is necessary to ensure a coherent and comprehensive development of the site and a reasonable timescale for the benefit of future occupiers and surrounding residents. A Demolition and Construction Environmental Management Plan (CEMP) (2) is necessary for each phase in order to safeguard the amenity of adjoining properties and open spaces.

13.5 A Construction Ecological Management Plan (3) and an Ecological Design Strategy (4) are necessary to conserve and enhance ecological interests in accordance with Policies HQ/1 and NH/4. For the same reason details of the biodiverse roofs (6) are required. A lighting scheme (5) is required to minimise light pollution within the surrounding area, including the conservation areas and to protect biodiversity.

13.6 A land contamination and remediation strategy (7,8,9) is necessary to safeguard health and avoid harm to ecological systems and controlled waters.

13.7 Details of arrangements for the management and maintenance of streets within the proposed development (10) are required to ensure a suitable and safe standard. A car and cycle management plan for each phase (11) is necessary to avoid unacceptable impacts of highway safety and the safety of users.

13.8 Notwithstanding the details that have been submitted, details of hard and soft landscaping are required for each phase, together with details of irrigation and maintenance and planting details (12,13) in order that the proposal delivers the high-quality public realm sought and enhances biodiversity.

13.9 Compliance with BREEAM ratings (14,15) are necessary to reduce carbon dioxide emissions and promote principles of sustainable construction, including water efficiency and efficient use of buildings in accordance with Policy CC/1. Any gas boilers should be restricted to low Nitrogen Oxide (NOx) combustion boilers (16), to protect local air quality and human health by ensuring that the

[103] ID 1.31

production of air pollutants such as nitrogen dioxide and particulate matter are kept to a minimum.

13.10 Details of the external materials to be used, together with sample panels and palettes (17,18) are necessary to ensure that the external surfaces are appropriate and that the quality and colour of the detailing of the facing materials are maintained throughout the development.

13.11 A detailed surface water drainage scheme, together with details of its management and maintenance (19) is necessary to ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development. For the same reason details of mitigation measures to address surface water run of during construction (20) are required.

13.12 A survey and report for the surface water drainage for each phase is required upon completion (21) to ensure the effective operation of the system. Details of the foul water drainage scheme, including its implementation (22) is necessary to reduce the risk of pollution.

13.13 A Bird Hazard Management Plan and a Glint and Glare assessment for PV panels (23,24) is necessary in the interests of air safety. For the same reason a limitation of height of buildings and permanent and temporary structures is necessary (27).

13.14 A noise assessment and a scheme for the insulation of buildings and/or plant (25) is necessary to protect residential amenity. Details of measures to address cooking odours from commercial kitchens (26) is also required in the interest of amenity.

13.15 The ES has been supplemented by a number of technical notes, therefore for the avoidance of doubt a condition requiring compliance with the ES and these notes is necessary. (28)

13.16 Details of electrical vehicle charging points and provision for passive provision to meet future demand is necessary (29) in the interests of air quality and to encourage sustainable travel.

13.17 Hours of work during construction should be restricted (30) in order to safeguard residential amenity. For the same reason collections and deliveries to non-residential premises (31) should be limited.

Conditions applicable to the detailed planning application

13.18 I have included the standard condition in relation to implementation (32) and compliance with the approved plans (33). A condition restricting the change of use of the upper floors of buildings S04, S06 and S07 from Use Class E(g)(i)and E(g)(ii) is necessary, since the appeal has been assessed based on the merits and demand for the proposed uses. For the same reason the change of use of the ground floor of these buildings, but including Class F, should be restricted (34,35).

Conditions applicable to the outline application

13.19 I have included the standard reserved matters condition for appearance, layout and scale, as well as the standard time limit for the submission of reserved matters and a condition requiring compliance with the approved plans, including the parameter plans (36,37,38).

13.20 A condition in relation to the quantum of development is necessary, since it is not included in the description of the proposal (39).

13.21 A noise assessment and noise attenuation/insulation scheme in respect of the residential accommodation is necessary in order to protect future occupants from road noise, including from the CGB.(40)

13.22 In order to ensure there is a mixed and balanced distribution of dwelling sizes and tenure types across the development in accordance with policies H/9 and H/10 details of the proposed housing mx is required (41).

13.23 To ensure a reasonable level of residential amenity and quality of life and the long-term sustainability and usability of the dwelling(s) in accordance with Policy H/12, the proposed dwellings should meet or exceed the Government's Technical Housing Standards - Nationally Described Space Standard (2015) (42). In order to create accessible and adaptable homes, in accordance with Policy H/9, 5% of dwellings shall be designed to meet the accessible and adaptable dwellings M4 (2) standard of the Building Regulations 2010 (as amended) or successor document, and details of any lifts proposed shall be submitted (43,44).

13.24 In the interests of reducing carbon dioxide emissions and promoting principles of sustainable construction and efficient use of buildings in accordance with Local Plan Policies CC/1, CC/3 and CC/4, a sustainability statement of each phase of the development is necessary (45).

13.25 Having regard to the water neutrality issues within Greater Cambridge, a Water Conservation Strategy is required to show that the dwellings would not use more than 89 litres per person per day (46).

13.26 A condition requiring details of waste and recycling facilities for the residential development is proposed. Since the details of waste storage would come within the scope of reserved matters, I find such a condition to be unnecessary. The funding for refuse receptacles is secured by Schedule 3 of the s106. For the same reason, I also find that draft condition 48 (waste collection for outline commercial development) is not required.

13.27 To ensure the provision of high-capacity broadband as part of the development, in accordance with Policy TI/10, fibre optic broadband should be installed and be operative (47).

13.28 With the exception of the community room proposed in Building S13 -S18, the ground floor of the commercial and residential buildings should be restricted to Class C3, Class E (excluding Class E (g) (iii)) and/or Class F since the appeal has been assessed based on the merits and demand for the proposed uses. The community room should be used for Class F2(b) only. (48).

13.29 The EA is concerned that the proposal, together with other development, may have an unacceptable effect on water quality and supply prior to the Grafham Transfer becoming operational. I deal with this matter in my assessment below. Should the Secretary of State disagree with my view and consider that the existing processes for ensuring a sustainable water supply would be insufficient, he may wish to impose an additional condition to limit the occupation of the proposed development. At the Inquiry, the appellant submitted suggested wording to limit the occupation of the residential accommodation in this manner, although considered the condition to be unnecessary for reasons the explained below.[104]

13.30 I have considered the suggested wording and agree with the Council's position, namely that the distinction between the residential parts of the scheme and the commercial part of the scheme in so far as water resources are concerned is not justified and I have adjusted the suggested wording accordingly. My recommended wording is found at draft condition 49. It would delay the occupation of the proposed buildings until either the Grafham Transfer is complete, or the WRMP has been approved and any measures required to maintain and deliver water in advance of the Grafham transfer have been implemented.

[104] ID 1.26

14 Conclusions

The following conclusions are based on the oral and written representations to the Inquiry and on my inspection of the site and its surroundings. The numbers in parentheses thus [ ] , refer to paragraphs in the preceding sections of this Report from which my conclusions are drawn.

14.1 Having regard to the putative reasons for refusal pursued by the Council, together with the development plan context, statutory obligations in relation to heritage assets, the evidence from the Environment Agency and Natural England and the evidence of interested parties, I find that the main considerations that need to be addressed relate to:

- Whether the proposed development would deliver the high-quality sustainable design and sense of place sought by the NPPF and development plan policies.
- The effect of the proposal on the character and appearance of the surrounding landscape with particular regard to the height and massing of the proposed development and the setting of the City of Cambridge.
- The effect of the proposed development on heritage assets, including the Fen Ditton and Riverside and Stourbridge Conservation Areas.
- Whether the proposed development would provide suitable living conditions for future occupants with reference to the potential number of single aspect, north facing apartments.
- Whether the proposal would prejudice the comprehensive vision for the wider area.
- The effect of the proposal on water resources.
- The benefits of the proposal including the provision of employment space.
- The overall planning balance.

Design

14.2 In this section I consider whether the appeal proposal would deliver a high-quality mixed-use development that would function well over its lifetime in accordance with Policy SS/4 and paragraph 126 of the NPPF. The Council's concerns with the design of the proposal also include the impact on the wider landscape and the historic environment. These are discussed separately below.

Layout of the Site and Uses

14.3 The Council is critical of the type of employment uses proposed and the segregation of the employment and residential uses. With the exception of building S04, the employment uses are located between the railway line and Milton Avenue, whilst the residential use is located on the western side of Milton Avenue. The Council considers that this arrangement would mean that activity

within the commercial area would be largely confined to the weekday morning and evening peaks and lunchtimes, since the footfall would be largely driven by the employment uses. It does not consider that the animation provided by the ground floor uses would address this issue. Ms de Boom suggested that the residential accommodation should be dispersed throughout the site. [7.7, 7.9, 7.10]

14.4 The Council contend that mixing the uses across the site would improve the levels of activity at street level and extend the activity throughout the day and into the evening to contribute to a thriving community. There is limited evidence to support this view. In terms of restaurants and bars, an additional 2- or 3-minute walk is unlikely to influence a resident's decision to use a bar or restaurant. Similarly visiting other shops and services is likely to be driven by need rather than distance.

14.5 In addition, the Novotel adjoins the site, and it is probable that hotel guests would make use of the facilities during the evening or weekend, as well as residents of the nearby Chesterton residential area. It is predicted that there would be about 750 residents at Chesterton Gardens and more than 4000 workers throughout the scheme. The number of residents and employees using this area are likely to increase should the proposals for the NECAAP go ahead. [6.16, 6.17]

14.6 The appellant set out the practical consequences of splitting the residential uses across the site. These include but are not limited to the quality of open space and play areas and rainwater harvesting. In terms of amenity, locating the residential uses close to the existing residential development at Chesterton, Bramblefield Nature Reserve and the allotments, and separating it from evening uses would provide a higher quality residential environment, particularly for those with children, by comparison with the eastern part of the site which adjoins the railway line and the railhead aggregates site.[6.14]

14.7 The submission draft of the NECAAP illustrates how residential uses could be incorporated into mixed use buildings, however, the buildings within the illustrations are generally 6 storeys or more in height by comparison with the 4 storeys generally proposed as part of this proposal.[105] Given the Council's opposition to the height of the proposed buildings throughout the site, I find that there is limited scope for mixed use buildings as part of the appeal proposal.

14.8 The proposal also includes some flexibility to accommodate other uses on the site in that the mobility hub (Building S05) is designed to allow the conversion of some or all of the floors to residential use should the parking provided not be required in the future.[106] Whilst this may provide acceptable residential accommodation in this location, it would be unlikely to add significantly to the vitality of the streets during evenings and weekends.

14.9 It may take some time for the evening and weekend economy to establish, as is the case in many new areas, but there is nothing intrinsic in the mix of

[105] CD 5.32 Figure 32 (page 152)
[106] CD1.11A

proposed uses that should be an impediment to such establishment. Overall, I am satisfied that the separation of the residential and commercial uses would assist with providing the best quality of accommodation for each use and would not give rise to an inactive frontage.

14.10 The Council is critical of the large footplate buildings that it considers provide limited opportunity for stepping and result in overly long elevations at odds with the finer grained approach recommended by the NEC Townscape Strategy.[107] [6.18, 7.10, 7.11, 7.12]

14.11 The purpose of the Townscape Strategy is to provide an overall framework to ensure that the development of individual sites within NECAAP area is coordinated to create holistic, connected and high-quality places. The Townscape Strategy is built on the evidence provided in the NEC '*Townscape Assessment', 'Heritage Impact Assessment' and 'Landscape Character and Visual Impact Assessment'* reports prepared as a supporting evidence base to the NECAAP.[108] The Townscape Strategy is not part of the development plan, moreover, it suggests that the development of the appeal site and its surroundings should be residential led.[109] This is at odds with the adopted development plan, in particular Policy SS/4 and the agreed position of the parties, namely that the development of this area should be employment focussed. Therefore, I do not afford the Townscape Strategy any significant weight.

14.12 In architectural terms, the fine-grained approach sought by the Council is not limited to smaller block sizes and stepped frontages. Indeed, the Townscape Strategy acknowledges that the degree of differentiation permitted between neighbouring developments will vary according to the character and role of areas. Whilst some of the examples it provides involve vertical changes in materials others do not, and there would appear to be limited stepping in the front elevations.[110]

14.13 There are other effective means of achieving a fine-grained approach. This is evident in the arrangement and elevational treatment of Buildings S06 and S07. The articulation provided by the staggered fingers is carried through to both elevations and there is also a variation in the building line of each building. The balconies, overhangs and materials would provide variety and interest to the facades. I do not share the Council's view that Buildings S06 and S07 would appear boring and overbearing. [6.23, 6,24, 7.23, 7.24]

14.14 In terms of Building S04, the stepping of the façade in and out on three sides would break up the elevations and provide interest, particularly at the ground floor level, where there is a cut-out colonnade at the junction with Milton Walk. [6.25, 6.26]

14.15 I find that although the proposal includes a number of large floorplate buildings, some with long elevations, it is apparent from the design of the

[107] CD 5.15
[108] 5.15 paragraph 1.1.4
[109] CD 5.15 Figure 4.1
[110] CD 5.15 pages 60-61

buildings within the full application that these are able to provide a significant level of articulation, both in terms of footprint and elevation.

14.16 The appellant drew attention to the number of large floorplate buildings within historic Cambridge as well as those close to the appeal site. Those within the historic centre are generally heavily articulated in terms of their footprint and elevations, whilst some of the more recent buildings within the science parks have long uniform frontages. However, the buildings proposed as part of the full application include significant articulation through changes in height, building lines and materials. In the case of buildings S06 and S07 the parties agree that these elements are successful in reducing the apparent massing and proportions of the buildings. There is no reason why the buildings proposed as part of the outline application cannot adopt a similar design approach. [6.18]

14.17 Ms de Boom, on behalf of the Council, suggested that the spaces between S06 and S07 should be wider in order to improve permeability. Wider gaps would link this part of the site with the railway line, rather than the remainder of the proposal. More significantly, since Milton Avenue is an existing route linking the station with Cowley Circus, if buildings S06 and S07 were re-oriented as suggested it would greatly limit pedestrian and cycle permeability within the site and would not allow for logical routes through the site to connect the rest of the NECAAP area with the Station. Wider gaps would also open up views of the railway line and associated overhead gantries, and fail to provide the enclosure to Chesterton Square which is the main public open space, and in doing so it would significantly detract from the overall masterplan. [7.13, 7.16, 6.19, 6.28]

Street Hierarchy

14.18 The Council considers that there is a lack of distinction between Milton Avenue and Station Row, such that there is not a legible street network with a strong sense of place. I disagree with this view. Milton Avenue would be a wider street and would be used by motorised vehicles and would be clearly distinguishable from Station Row, the use of which would be limited to pedestrians and cyclists. The two streets would also differ in terms of the landscape and type of planting, with a landscaped swale running along the length of Station Row.[7.15, 6.12]

14.19 The approach to both streets would also differ. Milton Avenue would lead from the Station to Cowley Circus where it would adjoin Cowley Road and Cowley Road North, both of which would also be used by motorised vehicles. Station Row would be a subsidiary pedestrian route leading from Milton Avenue, just north of the Novotel Hotel, and would continue to Cowley Road opposite the entrance to the Wild Park . There can be little doubt about the different functions and character of Milton Avenue and Station Row.[6.13]

Building S04

14.20 Guidance on height is provided by a number of documents, including the Regulation 18 NECAAP, The LCVIA, the North East Cambridge Impact assessment, Townscape Assessment, Townscape Strategy and the NECAAP

Regulation 19.[111] The suggested building heights vary significantly between these documents. In so far as it relates to the eastern part of the appeal site, the LCVIA suggests up to 9 storeys (27 m), the Townscape Strategy suggests up to 5 storeys (15m) and the NECAAP advising 4-6 storeys. Whilst all of these documents are material considerations, the NECAAP is intended to become part of the development plan and is informed by the other documents. For this reason, I afford greater weight to the guidance within it by comparison with the other documents. Notwithstanding this, the guidance within the NECAAP, including the suggested heights, have not yet been subject to consultation and can be afforded little weight. Consequently, the proposed buildings, including their height, falls to be assessed in terms of their contribution to the townscape of the proposal and any harm to the wider landscape.[7.14]

14.21 The heights within the Townscape Strategy and the NECAAP assume a storey height of 3 metres, typical of a residential development. Both the SCLP and the Cambridge City Local Plan allocate the NECAAP area for employment focussed development which would, of necessity, require greater floor to ceiling heights and the need to accommodate plant. In response to my questions, Mr Willis explained, on behalf of the appellant, that the British Council for Offices recently updated its guidance in relation to storey heights. These heights are used in respect of the proposed office and laboratory buildings.

14.22 Building S04 is 7 storeys in height at the southeast corner and is marginally higher than One Cambridge Square (0.85 m) despite having the same number of storeys. This is due to changes in Building Council for Offices guidance.[112] The building steps down in height by 2 storeys towards the north. In addition, the north-east corner of the building is set back at ground level via a double height colonnade. The colonnade continues around the north, addressing the pedestrian and landscaped Milton Walk, with the entrance to the cycle amenities, including changing facilities, adjacent to the new cycle route running east west. The proposed terraces to levels 5 and 6, would be set back with the metal and glass materiality forming a 'lighter' more 'pavilion' character. Taken together with the articulation and materials, the proposed building would provide a successful transition between One Cambridge Square and Chesterton Gardens. The marginal increase in height adjacent to One Cambridge Square would be imperceptible in views at street level. [6.24, 6.25]

14.23 I agree with the Council that there is no need for Building S04 to be the same (or similar) height as One Cambridge Square. The aim of building S04 is to provide a transition between One Cambridge Square and the four storey residential properties at Chesterton Gardens. Although building S04 would be a large and prominent building, unlike One Cambridge Square it would benefit from significant articulation to the elevations and variation in materials. The planted terraces would add to the visual interest. Having regard to the overall composition of building S04, including its height, I do not consider that it would be overbearing. I find that it would provide a successful transition between One Cambridge Square and the proposed residential use.[7.16]

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[111] CD 5.13,CD 5.15, CD 5.29, CD 5.32,CD 5.34, CD 5.36,

[112] CD 8.06 Figure 6 page 6

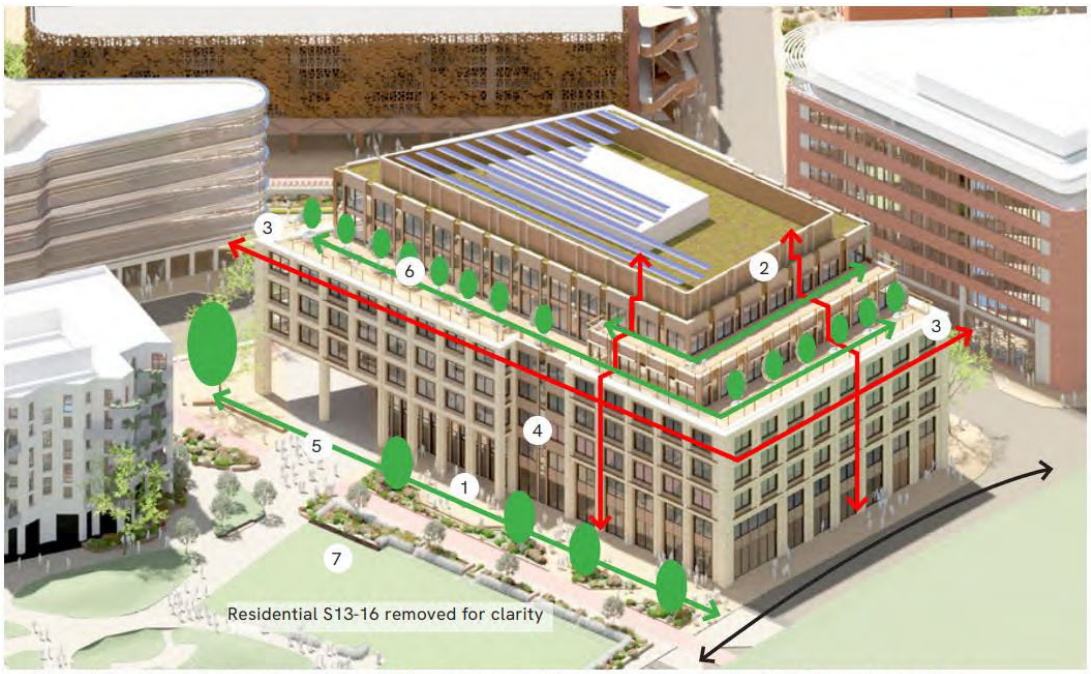


Fig. 11 Illustrative axonometric of One Milton Avenue, looking south-east, showing key design principles.

14.24 The Council is critical of the impact of Building S04 on the character of Chesterton Way. The Chesterton Way elevation of Building S04 would provide access to the basement parking and will include a substation. It would inevitably have a more utilitarian appearance at ground floor due to the need to provide access to the car park and the substation. However, it would include areas of glazing and an entrance at ground floor, and the upper storeys would be detailed to match the remainder of the building and would include the terraces to the upper storeys. [7.17]

14.25 Chesterton Way accommodates a cycle route and the CGB. There is a significant area of landscaping on the west side of Chesterton Way that will be retained and improved. It may be used by some pedestrians to access the Station, but for most, including those within the future NECAAP area, the more direct and pleasant route would be along Milton Avenue and/or Milton Walk.

14.26 I acknowledge that the ground floor Chesterton Way elevation would be less visually attractive by comparison with the other elevations, but it would not be without visual interest, and, given the functional requirements of the building, it would be acceptable in townscape terms. Additionally, it is unlikely to be a heavily used pedestrian route. [6.40, 6.41]

Buildings S06 and S07

14.27 Buildings S06 and S07 are located between the railway line and Station Row. They would be separated by a pocket park. They would be 4 storeys tall with plant above. Levels 3 and 4 to the east and west elevations would be stepped back and would provide amenity space and opportunities for planting. The buildings would be well articulated with changes in heights, building line and materials, with each building creating four bays. The main entrance to the

buildings would be from Station Row. The eastern elevation would provide vehicular access to the basement car parking.

14.28 As acknowledged by the Committee Report at the time of the application, the bays are well proportioned and are successful in reducing the apparent massing and proportions of the buildings in views from street level or from a passing train. The elevational design introduces a sense of depth and rhythm, and a finer grain / human scale to the buildings.[113] There is also agreement in respect of the proposed materials and the manner in which rooftop plant has been integrated.

14.29 Notwithstanding this, Ms de Boom, on behalf of the Council contends that due to the repetition of the design across both blocks the benefit of the articulation is lost, resulting in a long boring elevation, lacking variety and human scale.[114] This would appear to be at odds with what has been agreed between the parties and it is also notable that whilst the putative reasons criticised the eastern edge of the site in terms of landscape and visual effects, there was no criticism of the design of these buildings.[5.9, 5.10, 6.23, 7.20]

14.30 Buildings S06 and S07 face towards the sensitive eastern edge of the site. The eastern elevation is designed as a principal elevation. It is set back from the railway edge by 16-18m with a band of trees differing in height. The impact of these buildings on the surrounding landscape is discussed below.[6.30, 6.31]

14.31 Overall, whilst there would be some uniformity between both buildings, the variations in building line, the proposed stepping, elevational treatment of the different bays and materials would avoid a monotonous appearance. They would also provide a sense of enclosure to Chesterton Square. In my view the footprint, articulation and proposed materials combine to provide high-quality, well-designed buildings.

Buildings S08 and S09

14.32 Outline planning permission is sought for buildings S08 and S09. These would sit between Milton Avenue and Station Row and provide enclosure to Chesterton Square. The parameter plans establish maximum building heights, the extent of the ground floor and basement building envelopes, the building heights, ground floor uses, and access points.[115]

14.33 The Council's concerns are that the height of the proposed buildings would compound the impacts of the eastern edge on the surrounding landscape. It is also concerned that it is the back of building S09 that overlooks the Wild Park. In the Council's view, any attempt to activate this frontage is unlikely to be successful until the development to the north of the appeal site comes forward. [7.27, 6.36, 6.37]

14.34 Building S09 is directly opposite the Wild Park. The ground floor parameter plan that shows much of the ground floor to the northern elevation would be

[113] CD 4.0 paragraphs 12.86 – 12.92
[114] CD 9.04 paragraphs 5.52 & 5.53
[115] CD 2.22-28

activated, the exception being the entrance to the basement car park.[116] Moreover, the proposals for this building are in outline and the extent of the activation at ground floor level is a matter that could be addressed once detailed proposals are submitted.

14.35 The effect of the height of these buildings in the wider landscape is considered below.

Landscape

14.36 The formal children's play space is located partly within Chesterton Gardens and partly within the Wild Park. Whilst the Council accepts that the quantum of play space is acceptable, it considers that the access to the Wild Park is unsuitable and that there is a conflict between the use of the Wild Park for play and its drainage and ecology role. The Wild Park would comprise a large space around a permanent water body and would provide recreation and play opportunities, as well as informal public open space. It would utilise the existing open mosaic habitat, which is created and sustained by disturbance, and therefore the use of this area for play would not harm this habitat or be inconsistent with it.

14.37 At the Inquiry, the appellant explained that the Wild Park was intended to provide facilities for slightly older children and would allow for more imaginative play. It would include seating areas for adults and access to it would involve crossing Milton Avenue and Cowley Road. It would however, be located close to the proposed dwellings and there would be a controlled crossing at Milton Avenue, whilst traffic using Cowley Road would be largely limited to vehicles using the basement parking for buildings S09 and S07 and these are likely to be travelling at low speeds.[117] The Highway Authority raised no concerns in relation to this matter and I agree that the access to the Wild Park is satisfactory. [7.31, 6.35, 6.39]

14.38 The pond within the Wild Park would be a permanent feature with sufficient capacity to accommodate surface water from the drainage system when required. This approach is entirely consistent with SuDS schemes and I do not see any conflict between the proposed pond and the use of this area by older children for play.

14.39 Chesterton Square is the most significant space within the public realm. It is framed by buildings S07, S08, S09 and Milton Avenue. It would include tree planting and an interactive water feature. Mr Wakefield on behalf of the Council suggested that Chesterton Square had no clear function and it was unclear as to the extent to which it would be overshadowed. The detailed arrangement of Chesterton Square is shown on CD 2.49. It includes a water feature a cluster of trees with seating, seating areas and public art as well as areas of planting. It would be enclosed on three sides by the proposed buildings, all with active frontages facing towards it.

[116] CD 2.27
[117] CD 2.45

14.40 Due to its location and arrangement, Chesterton Square has the potential to be a successful public square serving both workers and residents. In warmer weather it would benefit from the shade provided by the trees. There would be a degree of overshadowing from building S08, but this would not significantly affect the functioning of the Square and may be welcome in hot weather. The detailed treatment of this area has been carefully considered by the appellant and includes paving designed to reference the former railway tracks. I consider that it would make a positive contribution to the public realm, encourage social

interaction and contribute to the functioning of the proposed Urban Quarter. [6.42]

14.41 The Council is particularly critical of the eastern edge due to the height and separation of the proposed buildings, the lack of variation in building heights and the landscaping to the eastern edge. These concerns primarily relate to the impact of the proposal on the wider area rather than the quality of the proposed development and are addressed below.

14.42 Overall, I conclude that the proposal would deliver a high quality design and a distinctive sense of place in accordance with Policies HQ/1 and SS/4 of the Local Plan.

Landscape and visual effects

14.43 Together Policies HQ/1 and NH/8 seek a high quality of design and, amongst other matters, expect proposals to respect and retain or enhance the character and distinctiveness of the local landscape and of the National Character Area in which it is located. NH/8 aims to mitigate adverse impacts of development adjoining the Green Belt.

14.44 The parties also reference the LCVIA and the NEC Townscape Assessment.[118] The purpose of the LCVIA is to provide an appraisal of existing landscape character and visual amenity at the Site and surrounding Fen Edge landscape as well as the potential effects of high, medium and low development height scenarios within the NECAAP area. Mr Smith, on behalf of the appellant acknowledged that this was the most useful and up to date character study.[6.44, 7.30]

14.45 The model for each scenario was amended to give alternative development height options within blocks in order to reduce the effects on the landscape character and views to the east and north of the Site and on the Fen Edge landscape. This included sub-dividing Block 4 (the appeal site) and adjusting building heights to allow a gradation from low in the east to higher in the west. Block 4 was modelled on the basis of up to 4 storeys at the eastern edge grading up to 6 storeys in the northern part of the Block and up to 7 storeys adjacent. These scenarios were then assessed in terms of their impact on landscape character and views.

14.46 The outcome of these assessments is summarised within the Design Guidance section.[119] This explains that the eastern and northern edges of the NECAAP are sensitive to high and medium height development. In the case of Block 4 it suggested that medium/high height buildings should be considered, whereas in the case of Blocks 2 and 3 (to the north of Block 4) it suggests a gradation in height rising from low buildings at the eastern edge, although these are refined from the original model.

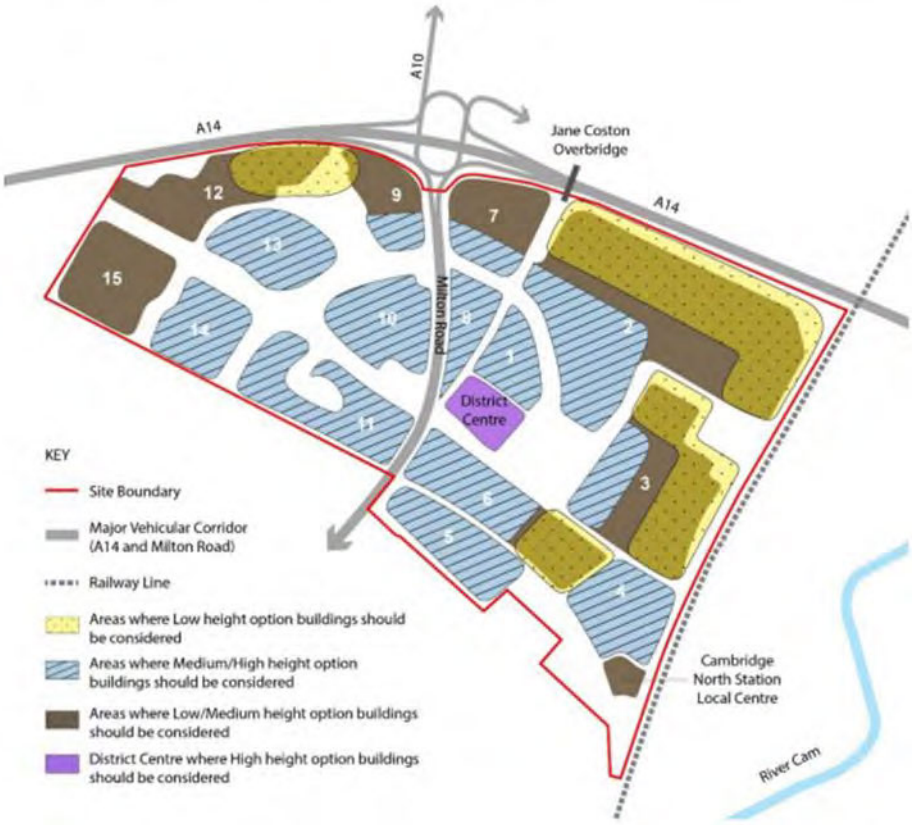
[118] CD 5.13 and CD 5.15. The LCVIA is sometimes referred to as the TEP Report by the parties.

[119] CD 5.13 paragraphs 5.10-5.12 and diagram 1

14.47 The Council suggest that the design guidance needs to be understood in the context of what was modelled for Block 4, (4 storeys across the eastern part).[120] However, the purpose of the modelling was to inform the landscape and visual assessments. Its purpose was not to dictate the acceptable height or scale of development. The design guidance, including Diagram 1 combined with the text at paragraph 5.10, is clear that medium/high height buildings may be appropriate within Block 4. The guidance includes the entire NECAAP site and states that:

"*the height and massing of buildings should avoid dominating views of the skyline from the east and should avoid creating an abrupt transition from development to rural edge as well as compromising the quality and character of views and landscape in the River Cam Corridor LCA*". [7.31, 7.32]

Diagram 1: Graphic showing potential areas of development heights



14.48 The LCVIA is one of the documents that informed the Townscape Strategy. The most recent iteration of the Council's approach to building heights is found within the NECAAP submission draft. This sets out a height of 4 – 6 storeys along the eastern edge of the appeal site, with a maximum height of 22 m. However, for the reasons given above, I afford little weight to the heights within

[120] CD 5.13B figures 5.1,5.2,5.3

the Townscape Strategy and the NECAAP and find that the proposal would accord with the design guidance in the LCVIA.

14.49 Buildings S06 and S07 would be 4 storeys plus plant above ground. They are designed to step down from 22.1m maximum to just over 20m, 17.4m and 13.4 m. For a site that is employment focussed by virtue of the development plan, limiting the overall height by reference to residential floor to ceiling heights would seem to be irrational. The issue is not whether the proposed height complies with, or exceeds, the height guidance within these various documents, but whether it would have an adverse impact on the character or appearance of the surrounding landscape.[6.22]

Landscape character

14.50 The landscape impacts were assessed by the Bidwells LVIA that formed part of the ES, Mr Wakefield on behalf of the Council, and Mr Smith on behalf of the appellant. The differences between the assessments are set out at Table JSR2.[121] There was no dispute between the parties in respect of the LVIA methodology or the accuracy of the visualisations.[6.45]

14.51 The proposal would change the character of the part of the Cambridge urban area in which it is located. This area is currently characterised by brownfield land but is clearly undergoing regeneration as evidenced by Cambridge North Station, One Cambridge Square and the Novotel. The site and the surrounding area come within the NECAAP area where the SCDC Local Plan and the Cambridge City Local Plan promote the establishment of a new Urban Quarter. Such a proposal would inevitably have an impact on the appeal site and the surrounding landscape in terms of its character and appearance.

14.52 There are number of relevant landscape character assessments for the area.[122] The most recent assessment is the Greater Cambridge Landscape Character Assessment, prepared on behalf of SCDC and Cambridge City Council. It draws on the earlier assessments.[123] This divides the area into 9 generic Landscape Character Types that share broadly similar patterns of physical and cultural attributes. These are subdivided into 33 Landscape Character Areas, which are unique, individual geographical areas.

14.53 The appeal site, together with the development on the west side of Fen Road (predominantly traveller sites and small-scale commercial uses), lie within the Cambridge Urban Area. This area is adjoined by the River Cam Valley (Character Area 9A) which the parties agree is the most sensitive area in terms of landscape and visual impact. I agree with the parties that the most sensitive areas in terms of landscape impact are the River Cam Valley (Area 9A), area 6A (which includes Fen Ditton), and the residential area. [6.44]

14.54 There is agreement between the parties as to the landscape sensitivity, magnitude, and significance of effects in respect of three areas. It is agreed that the significance of effects on the railway corridor would be moderately

[121] CD 8.38B page 18
[122] CD 5.26, CD 5.28, CD 12.09
[123] CD 5.28

beneficial. They also agree that the significance of the landscape setting of the FDCA would be moderate/minor adverse since the proposed development would intensify the urban influence on the receptor and erode its rural quality. The significance of the townscape setting of RSCCA would be minor neutral in landscape terms due to the distance from the site and the intervening landscape and buildings which separate this area and the appeal site. [7.39]

14.55 The River Cam valley is characterised by the River Cam, the floodplain and the recreational use of both the river, the tow path and the green spaces along its length. It occupies two locations. One is to the southwest of Cambridge and the other is to the northeast, which is to the east of the appeal site. The key characteristics include:

- Distinctive green corridor within the Cambridge urban area.
- Scattered mature trees, hedgerows and hedgerow trees providing a strong sense of enclosure.
- Sparsely settled, with occasional vertical elements and views of built form on the urban edge visible in framed and filtered views between trees.
- Historic association between the City and its river enriches the setting of Cambridge.
- Well used landscape for recreation with strong historical and cultural associations.124

14.56 Overall, the Cam corridor has a semi-rural character, notwithstanding this, the river corridor is adjoined by urban development on one or both sides along much of its length. This is particularly noticeable, but not confined to, the southwestern part of the character area. In the vicinity of the appeal site, much of the corridor to the southern side of the river has a more open character due to Stourbridge Common and Fen Ditton Meadows. As acknowledged by the Council, built form along the edge of the Cambridge urban area is a distinctive feature. In addition, a number of vertical features such as chimneys, pylons, masts and church spires are visible within the landscape.[6.53]

14.57 The parties broadly agree that the River Cam Valley is a high value receptor. The appellant also acknowledges that it is a valued landscape for the purposes of NPPF 174 (a). Both Bidwells and the appellant assess the river corridor as having a medium susceptibility to change and a high/medium sensitivity overall. Bidwells and Mr Smith assessed the magnitude of effects to be low as the changes are indirect and with the presence of existing taller buildings close to the station and the sense of the settlement edge. In addition, both consider that the geographical extent of the change would be limited and views would be filtered by the trees. Both assessments find a moderate/minor adverse effect, since although there would be an increased visibility of the built form, this would be in the context of the proximity of the existing urban area and the site would remain separated from the River Cam Valley. [6.49, 7.40]

14.58 Mr Wakefield, on behalf of the Council, considered the susceptibility of the landscape to be high due to its strong landscape structure and low capacity to accept change. On this basis he contends that it has a high landscape

[124] CD 5.28b page 177.

sensitivity, which, when taken together with a medium magnitude of effects, gives rise to moderate/major overall significance.

14.59 However, Mr Wakefield's classification sets out more detailed assessment criteria. The *"high"* susceptibility to change category includes landscapes with a high degree of enclosure or intimacy with few detracting features and a strong landscape character. I agree with the appellant that the landscape does not benefit from a high degree of enclosure or intimacy. It also exhibits detracting features and evidence of recent change. I therefore find that it fits more closely with Mr Wakefield's medium category of susceptibility to change. On this basis, using Mr Wakefield's table 10.4, the landscape would have a medium/high sensitivity to change. [6.48, 6.52, 7.41]

14.60 This would accord with the Bidwells assessment. This describes a medium susceptibility to change , described as:

"*The receptor has some ability to accommodate the Proposed Development. There would be some consequences for the maintenance of the baseline and/or relevant planning policy*."

I consider that the medium categorisation more accurately reflects the landscape character of the River Cam Valley, since it clearly has accepted change during in recent years, including not only the Novotel Hotel and One Cambridge Square, but also various dwellings along its length.

14.61 Turning to the magnitude of effects, Mr Wakefield on behalf of the Council, finds a medium magnitude, whereas the appellant and LVIA conclude a low magnitude. I acknowledge that there is a sense of the settlement edge, including light from existing buildings. The height of the proposed buildings would, in my view, make a moderate contribution to the baseline character since they would rise above the existing low-rise development at Fen Road and would add to the existing built development on allocation SS/4. Whilst the key characteristics of the River Cam corridor include a green corridor within the Cambridge urban area, I nevertheless consider that due to the scale and disposition of the proposed buildings that the magnitude of change from the proposal would be medium rather than low. When combined with a medium high sensitivity to change this would result in a moderate adverse landscape effect to the River Cam Corridor.

14.62 The local residential area comprises the Chesterton Character area and the mixed-use development at Fen Road. Mr Wakefield assessed the local residential character of both areas together and concluded that there would be a moderate/major adverse effect overall. The appellant concluded a moderate/minor negative effect to the north, becoming minor and neutral to the south at Chesterton, and minor and moderate negative effects to Fen Road.

14.63 The principal difference between the parties was the magnitude of effects. Using Mr Wakefield's categorisation, 'major adverse' involves the total loss of key landscape characteristics. This clearly exceeds the impact. On the basis of Mr Wakefield's table there would be a moderate adverse landscape effect. At the Inquiry Mr Wakefield acknowledged that he had had regard to the worst-case scenario, and for this reason had focussed on the bungalows at Discovery Way. I agree with the appellant that over much of this area the proposed

development would not be visible. The character of these areas is already influenced by One Cambridge Square and the Novotel, and with careful design these areas have some ability to accommodate change without transformational effects on character. [6.56, 6.57]

14.64 The proposed new buildings would be perceived in the context of the existing Novotel and One Cambridge Square and would therefore be adding buildings of a similar scale and character to those that exist already. They would extent over only the northern edge of the Chesterton residential area but would be visible over a greater proportion of the Fen Road development.[125]

14.65 The effects on the Chesterton residential area would be geographically limited, as well as mitigated to some extent by the proposed planted terraces. I therefore agree with the appellant that there would be moderate/minor adverse effects to the north, reducing to minor and neutral to the south. The effect on Fen Road would be moderate negative due to the distance and the intervening railway infrastructure.

Visual effects

14.66 In addition to the matters in relation to specific viewpoints, the Council had a number of other concerns in respect of the visual impact of the proposal. These relate to the height and permeability of the buildings on the eastern edge.

14.67 The permeability of the proposal in terms of the layout and design of the proposal is discussed above. Both Mr Wakefield and Ms de Boom, on behalf of the Council, contend that the gaps between the buildings on the eastern edge are insufficient to break up the mass of the buildings in views from the River Cam corridor, and should be increased in width. The appellant submits that increasing the width would not allow the buildings to be viewed as individual buildings due to the meander of the river. Figure 3 of Ms de Boom's proof of evidence illustrates the extent of the views through the gaps between Buildings S06 and S07.[126] The diagram takes no account of intervening structures, buildings or vegetation and therefore in practice, views would be less extensive than suggested. Even on this basis, views are limited to parts of the traveller sites along Fen Road and a small area of Fen Ditton. Increasing the separation between these buildings would therefore impact on only a very small number of receptors, and there is little evidence to indicate that the changes would be beneficial.

14.68 The buildings along the eastern edge are designed to step down from 22.1m at plant level to just over 20m, 17.4m and 13.4 m. They would be separated from the eastern boundary by a distance of between 16 and 18 metres, and the railway would provide a further degree of separation. The proposal includes a belt of trees along the eastern elevation of Buildings S06 and S07. It is proposed to plant two overlapping rows of trees with plane trees, alders and Amelanchier. The plane trees are anticipated to reach 12 metres after 15 years and possibly 30-40m during the lifespan of the development. It is intended that the proposed trees would filter, rather than screen views of the proposal. The

[125] ZTV in drawing CN-003
[126] CD 9.04 page 21

Council does not consider that this would sufficiently soften the edge of the development. [6.22, 6.30]

14.69 The viewpoints used in the Bidwells LVIA (section 12 of the ES) were agreed with SCDC's Landscape Officer as suitable for assessing the visual effects of the development at the time the ES was prepared. However, the Council now believes additional viewpoints are required to assess the visual effects of the proposal.[127] These additional viewpoints were included in Mr Wakefield's proof of evidence and addressed by Mr Smith in his rebuttal evidence. The viewpoint numbers used by the Council do not correspond to those within the LVIA and in some instances there is no close comparative location in the Bidwells LVIA. My assessment below uses the numbering from the Bidwells LVIA and additional Node viewpoints.

14.70 Although the site visit took place during the summer, the photographs within the LVIA were taken during the winter months. At that time several of the trees along the tow path had been recently pollarded. Therefore the LVIA is likely to represent the worst-case scenario. Mr Smith's rebuttal evidence summarises the difference between the parties.[128] There are a number of viewpoints where the parties agree that there would either be no effect, or any effect would be negligible. The Council does not dispute any of the wirelines or modelled views submitted by the appellant.[129]

14.71 *Viewpoint 2 (Node viewpoints 8 & 9)* is located at Bramble Field Local Nature Reserve. The parties agree that the proposal would have a moderate adverse effect on the Bramblefields LNR and Fairham/Bourne Road. I agree with this assessment. The proposed development would be seen over the top of the existing dwellings and in the context of the existing development at One Cambridge Square.

14.72 *Viewpoint 5* is located at Ditton Meadows. The Council considered that a sequence of views was required from this location in order to understand the kinetic nature of the views from Ditton Meadows. These are Node viewpoints 1, 2, and 3 and extend along a 250m stretch of the Harcamlow Way. They were assessed by Mr Smith within the appellant's rebuttal evidence.[130] The Council consider that in these views the proposal would have a medium magnitude of change leading to a moderate/major adverse impact on these views at 15 years. [7.56]

14.73 At the time at which the photographs used in the LVIA were taken, the trees along the tow path had been heavily pollarded and whilst they provided a focal point, they provided limited screening. The footpath links the Cambridge North area with Fen Ditton and appears to be well-used by the public. I agree with the Council that the sensitivity of these views is high. It is an area used for recreation and people are likely to linger in the area. From Node viewpoint 1, Building S04 would be seen behind the Novotel and Building S06 and S07 would extend across the skyline at a lower level and would be viewed behind the

[127] CD 6.06 paragraph 8.33 & CD 6.08 paragraph 32
[128] CD 38.B pages 18-22
[129] CD 6.08 paragraph 24
[130] CD CN-056 – CN-061 (Modelled views)

existing development. Due to the low-lying nature of the landscape it would not obscure any scenic views and would be seen against a backdrop of existing development. The existing trees, even in their pollarded condition, would break up views of the buildings. The proposed development would occupy a small proportion of Node viewpoint 2 and an even smaller proportion of viewpoint 3 even in winter months, with views limited to gaps in the vegetation. I therefore conclude that the proposal would have a minor adverse effect on views from Ditton Meadows.[6.62, 7.57]

14.74 *Viewpoint 8 (Node viewpoint 20)* is located on footpath 85/6. The Council and Bidwell assess the proposal as having a major adverse effect on this viewpoint at year 15. The appellant finds a moderate adverse effect. This viewpoint is separated from the appeal site by the river. The views are from a relatively short section of a narrow-fenced footpath and would be filtered by the existing trees and other vegetation. In addition to Buildings S06 and S07, the upper part of Building S04 would be seen to the rear of building S06. The proposal would be seen over the top of the hedge and in the context of the existing Novotel and One Cambridge Square. Therefore whilst the effect of the change in view would be considerable, it would be from a very short length of the footpath. I therefore agree with the appellant that the proposal would have a moderate adverse effect on this view. [6.65, 7.58]

14.75 *Viewpoint E5 (Node Viewpoint 11).* Both parties agree that there would be a moderate adverse effect on Discovery Way and the CGB.

14.76 *Viewpoint E6 (Node viewpoints 16 and 17*). Fen Road is occupied by a number of traveller sites, with the individual plots accessed from a spine road. It is separated from the appeal site by the railway line. In views of the proposal from Fen Road, the existing Novotel is noticeable, but as a distant/background feature. Other than from the access road, public views are limited by the proximity and height of development on Fen Road, the narrowness of Fen Road and the distance of the viewpoint from the proposal. In my view, the Council's assessment of moderate/major adverse over emphasises the harm and I prefer the appellant's assessment of minor neutral harm to public views.

14.77 The views from within individual Traveller pitches would be private views, whereas GLIVIA3 advises that public views are more representative and should generally be used for assessments. Moreover, in general, the potential impacts of a proposed development on private views is not a planning consideration. The exception to this approach is where by virtue of the proximity, size and scale of a given development, the impact would be so severe as to affect the residential amenity of a dwelling. In views within close proximity of the western boundary of the travellers' site, Buildings S06 and S07 would be visible. They would be separated from this site by the railway line and intervening gantries and would also be set back from the eastern boundary of the appeal site, with the proposed tree belt. Although the proposal would be prominent in private views, from this part of the site, the harm arising would not be of a magnitude to affect residential amenity.

14.78 *Node VP 19 & 21.* The Council assessed two additional views from the tow path on the west bank of the river. This forms part of the Fen Rivers Way long distance footpath. From VP 21 the buildings would be clearly visible through a

lower area of vegetation, albeit in the context of the existing Cambridge North development. The appellant concludes a minor adverse effect at VP 19 and a major/moderate adverse effect at VP 21, whereas the Council concluded a major adverse effect for both. [6.61].

14.79 There are several locations along the tow path, particularly gateways, from where the appeal site can be readily viewed. In many instances trees in the foreground and mid-ground break up such views. From VP 19 the proposal would be seen over the existing hedge and views would be significantly screened by the existing vegetation, and the proposed trees.

14.80 From VP 21, Buildings S06 and S07 would, together with the existing buildings on the site, be noticeable. This would remain the case even if they were reduced in height. This is a relatively narrow viewpoint and the views are filtered to some extent by the existing trees in the mid-ground, and the proposed tree belt would further filter views. Given the sporadic nature of these views from the tow path, views of the proposal are likely to be kinetic views, of limited duration. One would generally need to stop and turn towards the appeal site in order to view the proposal. For most people, views of the riverside are more likely to be attractive, and the seats along the tow path face toward the river rather than the NECAAP.

14.81 With regard to VP 19, I consider the effects to be limited, due to the distance, and the intervening vegetation. Whilst I agree that there would be a significant adverse effect from VP 21, this would be a narrow view and of limited duration for the majority of recreational users. I therefore prefer the appellant's assessment of harm. [6.63, 7.60]

14.82 *Node viewpoints 22 and 23, t*he garden of the Plough Inn, Fen Ditton. The Council was critical of the appellant's failure to consider these views, since it was a location where people would go and sit and enjoy the views. The appellant contends that since it is not a public view point the sensitivity is reduced but acknowledges that the proposal would be seen from these viewpoints.

14.83 I agree that it is appropriate to assess the views from this location, since it is a location open to the public and used for recreational purposes. The Plough Inn is located opposite proposed Buildings S06 and S07 but separated by the river and the intervening development on both sides of Fen Road. Views from this location would change as a consequence of the proposal. The appellant identifies a moderate adverse effect, whilst the Council finds a major adverse effect.

14.84 In these views, Fen Road development occupies the foreground, but the Novotel, One Cambridge Square and the buildings at the Science Park are all noticeable. The proposal would infill the gap between these buildings, but at a distance. The garden to the public house has numerous tables and benches and I noted that most, if not all visitors were seated, with some facing towards the river and others facing away from it. When seated within this area views of the appeal site are much reduced. I therefore find the major adverse effect contended by the Council to be an overstatement of the harm. [6.64, 7.59]

14.85 The parties agree that the proposal would not significantly impact any of the Strategic Viewpoints identified within the Cambridge Local Plan.[131] The Council submits that there would nonetheless be a loss of views across the site towards St Mary's Church, Fen Ditton, and St Georges Church, Chesterton. Neither party assessed them as part of the LVIA, although these buildings are annotated in the Council's viewpoints 11 and 20. Both churches are a considerable distance from the site, and barely discernible in views, even on a clear day. I conclude that the proposal would not harm views of these local landmarks.

14.86 The Council submits that the appeal site occupies an urban/rural fringe location, and any development higher than the prevailing height of buildings within Cambridge will stand out on the skyline. There is agreement between the parties that the proposal would not harm the historic skyline of Cambridge. It would change the skyline in views from the River Cam Valley in particular, although this would be mitigated to some extent by distance, intervening vegetation and the proposed landscaping. I consider that it would avoid dominating the skyline in views from the east. The separation provided by the railway and the Fen Road development would avoid an abrupt transition from the development to the rural edge of Cambridge.

14.87 The change to the skyline needs to be considered in the context of the allocation of the site for a new Urban Quarter, which the emerging NECAAP suggests would accommodate 8,350 new homes and 15,000 new jobs. This would not be achievable without changes to the existing skyline. [6.54, 7.45]

14.88 I have identified moderate adverse harm to the landscape character of the River Cam corridor. Notwithstanding this, the key characteristics of this LCA would be maintained. There would also be visual harm to a number of viewpoints. For the most part this harm would occupy a limited part of the viewpoint or would be from a very specific vantage point and therefore would be localised. Consequently, the visual harm from these locations is not representative of the impact of the scheme on the River Cam corridor overall.

14.89 The site is part of an allocated site for an employment focussed new Urban Quarter. It is also the part of the allocated site closest to the station and other public transport facilities. Whilst the quantum of development is not specified within the development plan, it is clear from the emerging NECAAP that the Council envisages a significant scale of development. The Council's approach throughout the Inquiry appeared to be that anything other than very limited views of the development from the east would harm the character and appearance of the River Cam corridor. It suggested that lower buildings, screened by trees would be more suited to this location. This approach is at odds with the allocation of the site within the SCLP and the emerging NECAAP. Moreover, such an approach does not represent good design and is at odds with the aims of Section 12 of the NPPF. A new urban quarter should not blend into the predominantly single storey development on the opposite side of the railway line, or be largely screened from views. As explained by Mr Ludewig "*it should*

[131] CD 6.08 paragraphs 29 and 30

be done with careful consideration but also with confidence, in the spirit of the traditional Cambridge townscape." [6.33]

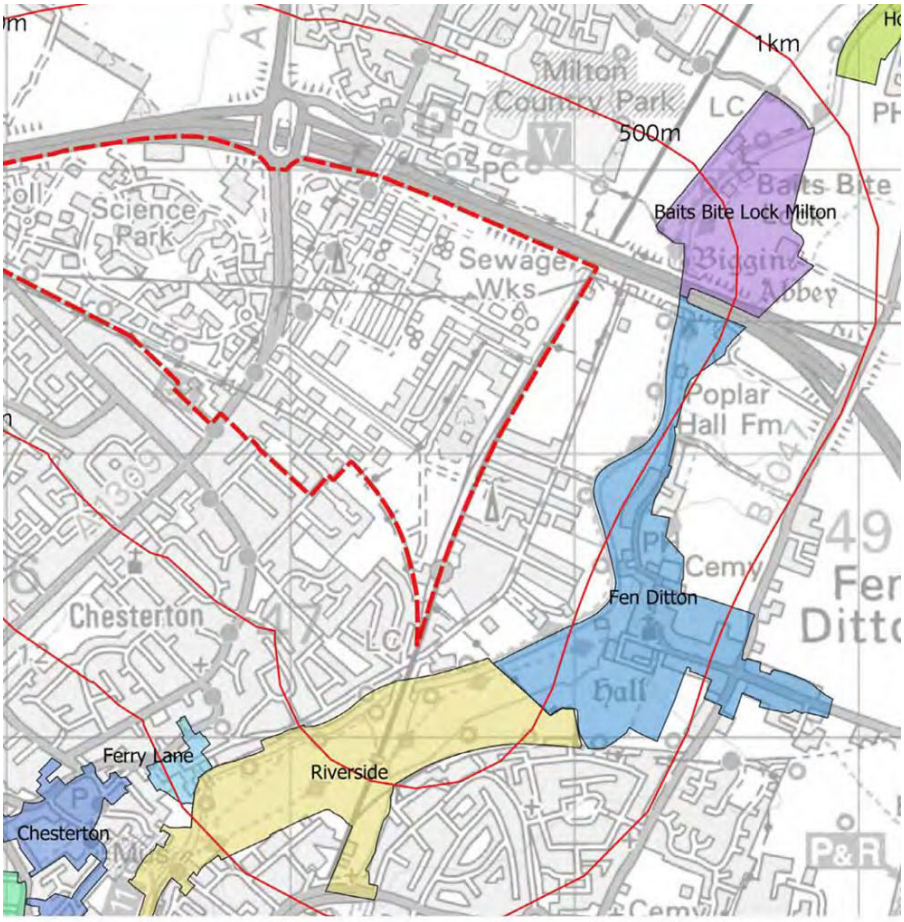
14.90 Overall, I conclude that the proposal would harm the character and appearance of the surrounding landscape, but such harm would be limited and generally localised and is mainly due to the change in the character of the site from a largely brownfield site to a new Urban Quarter. Considered in the context of the allocation of the site within the development plan, I find that the proposal as a whole would respect and retain the character and distinctiveness of the local landscape, including the River Cam corridor. It would therefore comply with Policies HQ/1 and NH/8.

Heritage

14.91 FDCA and the RSCCA are the closest heritage assets, with parts of their boundaries lying approximately 500m from the Site. Baits Bite Lock Conservation Area adjoins the FDCA beyond the A14 and is located to the northeast of the Site. The Grade II* Anglesey Abbey Registered Park and Garden lies approximately 5 kilometres north-east of the site. Following further assessment, the parties agree that there will be no impact on the heritage significance of the Anglesey Abbey RPG from the proposed development. Baits Bite Lock Conservation Area adjoins FDCA. Historic England suggest that the proposal would result in an overall moderate level of less than substantial harm to the significance this conservation area. However, neither the Council, nor the appellant submitted any evidence to support this view, or to suggest that the proposal would harm the significance of Baits Bite Lock Conservation Area. The appeal site is not noticeable from this conservation area, and on the basis of my own observations and the evidence submitted to the Inquiry, I conclude that the proposal would not harm the significance of the Baits Bite Lock Conservation Area. [7.61]

14.92 Section 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990 does not apply as the Site is not within a Conservation Area. However, as the development affects the setting of two conservation areas, the heritage policies in the NPPF are relevant in assessing the impact of the proposed development on the setting and how that contributes to character and appearance of the Conservation Areas. [6.65]

14.93 The Council believes that the proposal would cause a moderate level of less than substantial harm to both conservation areas, whereas Dr Burgess, on behalf of the appellant considers the harm to be a very low level of less than substantial harm. [7.62]



Riverside and Stourbridge Conservation Area

14.94 The conservation area is dominated by three open spaces, Midsummer Common with Park Green, Stourbridge Common and Ditton Meadows. The conservation area forms part of a green wedge which extends from the city centre to the boundary of the city, where it adjoins FDCA. Part of the northern boundary is populated by mobile homes along Fen Road and modern housing.

14.95 The character of these open spaces varies. Stourbridge Common has an urban character, as reflected by the formal footpaths, play areas, street furniture and use by local schools and cyclists. The Conservation Area Appraisal notes that the river and conservation area are the landscape feature, and the setting is the backcloth of development which is sometimes softened by mature trees.[132] Ditton Meadows benefits from a semi-rural character.[7.64]

14.96 The significance of the conservation area is derived in part from the ancient town fair that grew up around the leper hospital on Barnwell Abbey. The Riverside area was mostly built from 1880 to 1910 and became an industrial area with brick pits, coprolite mining and the pumping station and gas works. Some of these industrial buildings remain immediately to the southwest of Stourbridge Common. The area's association with medieval Cambridge, the development of Barnwell Priory and Stourbridge Fair and the enclosure of the

[132] CD 5.08 paragraph 3.2

East (Barnwell) Field in the C19 are all important aspects of its historic character. [6.67]

14.97 The setting of the conservation area makes a limited contribution to its significance. The most noticeable change in views from the conservation area would be from Ditton Meadows (Node viewpoints 1-3). As I found above, the proposal would have a minor adverse effect on these views. I conclude that as a result of these minor visual effects the proposal would cause less than substantial harm to the significance of the RSCCA and the harm would be towards the lowest end of the scale. [6.68]

14.98 The Council suggest that new development should be suburban in scale (2-3 storeys). This scale of development is at odds with existing development towards the southwest of the conservation area, as well as the existing Novotel and One Cambridge Square. This view also fails to have regard to the Policy SS/4 that seeks to establish the new Urban Quarter.

Fen Ditton Conservation Area

14.99 Fen Ditton is a linear village along Church Street/Green End and the High Street. The conservation area is focussed on the Church of St Mary the Virgin and the war memorial, with the River Cam forming the western boundary. The parties agree the significance of the conservation area as set out in the Conservation Area Appraisal:[133]

> (1) There is a clear focal point in the village: the group comprised of the Church, old Rectory, War Memorial and mature trees.
>
> (2) The good buildings and fine townscape of the village, which are of exceptional quality.
>
> (3) The relationship with the Cam − both visual across the meadow to the river, cultural (the Bumps course) and historic, bearing in mind the wharves and trade in the past.
>
> (4) Some identified views through the built form to the river and the meadows on the east side of the river.
>
> (5) The views of the urban fringe of Cambridge. [6.69]

14.100 The setting of the conservation area contributes to its heritage significance in that it ties the village to the agricultural land around it and recalls the former importance of the river to its early prosperity.

14.101 The historic buildings are concentrated within the High Street area that contrasts with the more suburban appearance of the Green End area. The village is contained within an agricultural setting with the river visible from the northern part of Green End.

[133] CD 5.07

14.102 The river was important to the early history of the village which at that time encompassed a strip of land extending from the church to Biggin Abbey. The wharves on the river became redundant following the construction of the railway line. The river is now largely of historic interest since there are no buildings that relate to the former wharves and river port. The cultural association with the river is maintained by the Bumps course.[134]

14.103 The water meadows border the Cam, enclose the village's western side and form a linear open space separating Fen Ditton from the river. Views of the river are a feature of some parts of the FDCA. The Conservation Area Appraisal notes that the river separates the village from the City. From some locations within the conservation area, particularly from Green End, views of the edge of Cambridge are noticeable.

14.104 The proposal would not affect the setting of the historic buildings within the conservation area, and the views from the focal point of the village would remain unchanged. The historic relationship with the river would also be unaffected, since the buildings related to the previous use of the river are no longer evident. The cultural associations, including the Bumps would remain.

14.105 The agricultural setting of the conservation area relies on the fields within the conservation area itself and to a lesser extent some of the land on the eastern side of Fen Road. The appeal site makes no contribution in this regard.

14.106 Views across the river are primarily from the northern part of Green End, the garden of the Plough PH and the footpath to the north of Fen Ditton (Viewpoint 8). The northern part of Green End comprises primarily mid/late 20 century housing. From Green End, views of the area beyond the tow path are largely screened by the existing trees. Moreover, given the distance of the appeal site from this viewpoint and the intervening development the proposal would not impact on the agricultural setting of this part of the conservation area. The views from the garden of the Plough PH would change, but as explained above would largely involve the infilling between the Science Park and the existing buildings at Cambridge North. In addition, the views from the footpath to the north would also change. Consequently, the proposal would add to the extent of built development in the latter two views, but such views would be localised and the degree of change would not harm the significance of the conservation area. [6.72, 7.66]

14.107 Overall, the proposal would slightly impact the significance of the conservation area as more buildings would be noticeable in views out from the area to its wider setting., and in this regard there would be some very limited conflict with Policy NH/14 that seeks to sustain and enhance the significance of heritage assets. The proposal would have no impact on views towards the village. I agree with the appellant that it is in these views that the surviving rural character of the village is best appreciated and enjoyed.

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[134] 'Bumping' is an unusual form of racing which evolved on the Cam during the 1820s. It involves crews from competing Colleges, on a short stretch of river most of which is too narrow or not straight enough to permit more conventional side-by-side knock-out regattas.

14.108 I conclude that the proposal would cause less than substantial harm to the significance of the FDCA, and the harm would be towards the lowest end of the scale. In accordance with paragraph 202 of the NPPF this harm, to which I attribute great weight, must be weighed against the public benefits of the proposal.

14.109 In reaching this conclusion I have had regard to the view of Historic England. The conservation areas would continue to form a continuous chain adjacent to the river, and the recreational use described would not be directly impacted. I disagree with Historic England's view that the modern development adjacent to the river at Stourbridge Common is small in scale. There are number of examples of buildings 5 storeys or more on both sides of the river, although I acknowledge that they are for the most part domestic buildings with a smaller footprint by comparison with the proposal. On the basis of the landscape evidence submitted on behalf of both parties, and as acknowledged above, there would be locations within both conservation areas where the built development would be readily visible, but these would be limited, particularly from within the conservation areas. Consequently, the views of Historic England do not alter my conclusions above.

Need for Employment Accommodation

14.110 The principle of employment uses, including offices and life sciences laboratory space is supported by Local Plan objective S/2 and Policies E/9 and SS/4. Policy S/5 aims to meet the objectively assessed need for 22,000 additional jobs to support the Cambridge Cluster for the period 2011-2031. The Council accepts that this figure is not a ceiling. The proposal would provide about 43,347 sq m (approx. 466,587 sq ft) of office and laboratory floorspace.[135]

14.111 It is undisputed that Cambridge makes a significant contribution to the regional and national economy and is considered to be a world leader in the life sciences industry. The importance of Cambridge in this regard was identified in the HM Treasury Spring Budget 2023. This confirmed that the Government would support new rail infrastructure to support strategic economic growth around stations. It also identified the need to support the provision of laboratory space, including along the Oxford/Cambridge corridor.[136] Such an approach is consistent with Section 6 of the NPPF. The Department for Science, Innovation and Technology similarly notes the importance of this sector to the prosperity and security of the country.[137]

14.112 The appeal site is a suitable location for office and laboratory space as evidenced by Policy SS/4 and the emerging NECAAP. However, the Council consider that it is "*not critical*" to meeting the need for such spaces since there are other locations in addition to the appeal site and the NECAAP area.[138]

[135] CD 6.06 page 37
[136] CD 8.36 paragraph 7.14
[137] CD 8.36 paragraphs 7.16-7.18.
[138] The latter includes Cambridge City Council area

14.113 Both parties submitted evidence in relation to the supply and demand for office and laboratory space within Cambridge. Updated evidence was submitted to the Inquiry to address inconsistencies in the manner in which the evidence was originally presented.[139] The parties, however, continue to define the medium term differently to each other. The appellant assessed the medium term as the period 2025 – 2028, whereas the Council used the period up to 2029.[140]

14.114 Based on the demand for floorspace within the Greater Cambridge Employment and Housing Evidence Update, allowing for the floorspace delivered up to the 2020/21 period the annualised demand for office and laboratory space for the period up to 2041 is 461,000 sqft.[141] [6.117]

14.115 For the three year period up to 2024 the parties agree that there would be a shortfall in both office and laboratory space. The Council's position is that 910,000 sqft would be delivered (303,000 sqft pa) whereas the appellant finds that 735,000 sqft (245,000 sqft pa) would be delivered.[142] This difference is due to the inclusion of two additional properties disputed by the appellant. [6.117, 7.100]

14.116 The Wellcome One building would be part of the University Campus and would not be available to the commercial market. I therefore agree that it should be excluded. The AstraZeneca site is being developed as an owner occupier property and would not be commercially available. Nonetheless, it would seem that the demand from Astrazeneca was taken into account in the assessment of demand. Therefore whilst it would not be commercially available it nonetheless contributes towards meeting the assessed demand. It should therefore remain as part of the supply. I therefore conclude that the supply for the period up to 2024 would be about 866,000 sqft (289,000 sqft pa) and this represents a significant shortfall. [6.117, 6.118, 6.119, 7.102]

14.117 The parties differ as to whether there would be a shortfall over the medium term. The Council accepts that the proposed floorspace would be delivered in the medium term (the period up to 2030) and if built it would be let. It nonetheless considers that there is a significant supply pipeline, including allocations at Cambridge East, CBC and Babraham Research Campus that is anticipated to deliver floorspace over this period. The Council therefore contends that the appeal site is not critical to the delivery of office and laboratory floorspace over this period.

14.118 The supply of floorspace over this period was modelled including and excluding the floorspace to be delivered by the appeal scheme. For the purposes of my assessment I have excluded the appeal scheme from the supply of floorspace.[143] When assessed against the annualised requirement for this

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[139] ID1.23 & ID1.24

[140] There is also an anomaly between ID1.23 Document 2 (the Council's assessment) and the tables within ID 1.24. Where differences arise I have relied upon the Council's figures within ID 1.24 since this was submitted by the Council.

[141] ID1.24 paragraph 4.4

[142] ID 1.24 paragraph 4.2

[143] The different scenarios can be found at ID1.23 and ID1.24

period the Council finds that 643,000 sqft of office and laboratory floorspace would be delivered each year, giving a surplus of 182,000 sqft per annum, whilst the appellant contends that 374,000 sq ft would be delivered with an annualised shortfall of 88,000 sqft pa.[144] There is broad agreement between the parties as to the amount of office space to be delivered during this period, but they differ as to the supply of laboratory floorspace.

14.119 In terms of laboratory floorspace the Council includes 95,954 sqft at the Peterhouse Technology Park. However, as submitted by the appellant this has also been included as office floorspace in the tables and therefore represents double counting and should be removed from the supply. The parties also disagree whether the floorspace at St John's Innovation Park should be included. Reserved matters in relation to this site have been approved, indicating that the owner intends to progress the scheme. Although one tenant remains, on the basis of the information submitted to the Inquiry I consider there to be a realistic prospect that the floorspace at this site would be delivered in the next 4 to 5 years. Therefore, it should remain part of the supply.

14.120 The Council has also included four sites with outline permission.[145] There is no substantive evidence to indicate that these sites would be delivered by 2028-2029. Reserved matters would need to be submitted and determined, and there is no certainty that they will be found to be acceptable, and it may be that either a further application or an appeal would be necessary. I therefore conclude that these four sites should be removed from the supply.

14.121 The Council also include 300,000 sqft at West Cambridge. There is a resolution to grant outline planning permission subject to a s106 agreement. However, at the present time there is no consent and this floorspace should also be removed from the supply. Taking these sites together I find that the supply of floorspace would be closer to the figure put forward by the appellant. I therefore conclude that in the absence of the office and laboratory space to be delivered by the appeal site there would remain a shortfall in the medium period.

14.122 As acknowledged by both parties, the demand for office and laboratory space within Cambridge is also driven by the cluster effect. Policy E/9 identifies the appeal site as being especially suited for cluster development. The parties agree that the development would make a significant contribution to the local economy, especially as a proposal to support the knowledge-based Research and Development cluster in North East Cambridge. [6.113, 6.120]

14.123 Key clusters have largely grown up around the Science and Business Parks surrounding the City. The arc to the south of the City has been a primary focus for a Life Science cluster, which has grown up around Hospital / Cambridge Biomedical Campus, Babraham Research Campus and Wellcome Genome Campus with several major commercial parks in the region. Whereas the northern parks' success has been based on a broader ecosystem with a greater

[144] ID1.24 Table 4.4
[145] ID1.24 Table 3.1

mix of a Life Science, Engineering & Tech occupier base and has the benefit of being located closely together and being connected on the City edge.

14.124 I conclude that the proposal would assist with meeting the shortfall in laboratory and office floorspace in the short and medium term. It would also contribute to the continued growth of the Research and Development cluster in North East Cambridge area, in accordance with Policies E/9, SS/4 and S/5 as well as national planning policy.

Whether the proposed development would provide suitable living conditions for future occupants

14.125 The parties agree that the illustrative design includes approximately 25% single aspect and 75% dual aspect dwellings. Ms de Boom submits that for a large proportion of what the appellant considers to be "*dual aspect*" homes, the second aspect is created by the stepping of the building to create a second external wall. The Council considers such dwellings to be "*enhanced single aspect*" dwellings rather than dual aspect.[5.13, 7.25]

14.126 The design of a residential scheme needs to balance requirements to optimise densities, define and delineate attractive streets and create attractive, sustainable homes. The detailed layout of the proposed dwellings would be determined at the reserved matters stage. The rebuttal evidence submitted by the appellant demonstrates that the parameter plans would allow for flexibility in the layout and design of the proposed dwelling to limit the number of single aspect dwellings. It is acknowledged by the appellant that this may lead to a reduction in the overall number of dwellings. [6.39,7.26]

14.127 On the basis of the evidence submitted to the Inquiry I am satisfied that the proposed dwellings would provide suitable living conditions for future residents within the constraints of the parameter plans.

Comprehensive Development

14.128 The supporting text to Local Plan Policy SS4 indicates that schemes may come forward in advance of the AAP if they are acceptable on their merits and do not harm the wider comprehensive development of the NECAAP area. The Council (supported by the County Council) now agrees that the appeal scheme is acceptable in this regard due to the agreement over strategic transport contributions.

14.129 Mr Bodkin, for the owners of the Core Site (sewage works and neighbouring land) expresses concern over what is seen as the undersupply of homes on the site and the amount of proposed BtR and affordable housing in the scheme. It was argued that this would not accord with the Typologies Study and Development Capacity Assessment, part of the evidence base for the NECAAP.[146] It was suggested that the number and tenure of the dwellings proposed on the appeal site would hamper the ability of future clients to deliver a balanced and

[146] CD5.33

equitable housing market on the Core Site and could compromise the opportunity for the redevelopment of the wider area.[6.76, 10.7, 10.8, 10.9]

14.130 The Development Capacity Assessment does not allocate sites for development. It identifies sites within the NECAAP area with development potential for housing and economic land uses and sets out an indicative trajectory for deliverable (0-5 years) and developable (6 to 20 years) sites, to be monitored through annual reports and managed and assessed through the development management process.

14.131 Whilst Appendix B provides potential capacity and indicative housing trajectories for housing sites, the purpose of this document is to inform the emerging NECAAP. It also highlights constraints on the various land parcels, such as the railway in respect of parcel A3 (the part of the site closest to the railway) and it does not represent an allocation. On the basis of the evidence submitted to the Inquiry, I do not find that the quantum or tenure of housing proposed would compromise the redevelopment of the wider area. I also note that the Council are satisfied with the quantum of housing proposed and the tenure.

14.132 The planning of the area is affected by the CWWTW, which covers a significant part of the area and is a significant constraint on development within the NECAAP. Although a DCO has been submitted for the relocation of the works, at the present time there is no certainty that it would be permitted, or when and if this site becomes available. Therefore in the absence of a DCO and evidence regarding and timing of the relocation of the CWWTW there can be no certainty the development of this part of the NECAAP will progress. [6.77]

14.133 The development plan for the appeal site, identifies the site for employment focussed development. I therefore consider that the failure to comply with the Development Capacity Assessment, which has not been subject to consultation and is not part of the development plan does not add weight against the proposal.

14.134 The emerging NEC Infrastructure Delivery Plan is predicated on the development of the wider area proceeding as in the draft NECAAP. Since at this stage there is no certainty that this will be the case, the proposed development needs to mitigate its impact on the services and infrastructure. Any other approach would not comply with the CIL regulations. The proposal makes provision for a range of infrastructure on and offsite. The Council and the Highway Authority are satisfied that, subject to the planning obligations, the proposal would not prejudice the future development of the wider area. In the absence of any substantive evidence to the contrary I have no reason to reach a different conclusion.

Transport

14.135 As set out above, there are no matters remaining in dispute between the parties in terms of transport.

14.136 The development is expected to increase the number of pedestrian, cycle and public transport trips to the site, and the Transport Evidence Base determines that with the additional infrastructure in the area that is identified within the

Infrastructure Delivery Plan, then it is possible for the additional development in the AAP to be bought forward.

14.137 The appellant submitted further information by way of Technical Note T6118 to address the interaction between the proposed Use Class E uses and, the Aggregates Railhead. The SoCG confirms that the aggregates railhead would not prejudice the existing or future uses of the rail aggregate area.

14.138 I conclude that the proposal would be acceptable in terms of its impact on the highway network, and would make appropriate provision for sustainable travel.

Water Supply and Quality

14.139 The EA considers that ground water abstraction in the Greater Cambridge area is adversely affecting water bodies and causing ecological harm. It submits that there is a risk of deterioration if groundwater abstraction increases above current levels. It suggests that abstraction will need to be reduced significantly from the current licenced levels to safeguard natural river flow within the catchment.[147][9.2, 9.4]

14.140 The EA has issued details of licence caps to CW as a means of managing the risk to groundwater quality. Therefore, the availability of water supply once the licence caps come into effect is likely to be lower than that set out in CW's existing Water Resources Management Plan, published in 2019 (WRMP19). [9.5]

14.141 As a consequence, the EA also suggests that the amount of overall growth in Cambridgeshire would need to be reduced, or the amount of water it needs would need to be reduced until the Grafham Transfer is available in 2032. It advises that this risk could be managed through the later delivery of development and demand management including greater water efficiency within developments.

14.142 The appellant disputes that the evidence supports the EA's view that existing levels of water abstraction is giving rise to ecological harm. Appendix 1 of the EA's submission "*Baseline data of risk of deterioration to water bodies from water abstraction*" identifies 12 surface waterbodies affected by CW abstraction where it submits that the hydrological regime does not support good ecological status.[148] It particularly notes three waterbodies where it believes that abstraction is currently a contributing factor to ecological pressure. These are the Granta, River Cam (Audley End to Stapleford) and Cam (Stapleford to Hauxton Junction). [6.86, 6.87, 6.88, 6.89, 6.90, 6.91, 9.11]

14.143 Appendix 1 assesses whether the ecological community is being impaired by flow pressure as a result of abstraction. Mr Bax, on behalf of the EA explained that macroinvertebrates are commonly used as bio-indicators of flow pressure, due to a good understanding of the ecological requirements of different families/

[147] These exceed historic abstraction levels
[148] CD 13.02 Appendix 1

species and available metrics that summarise the sensitivity of taxa to such impacts.

14.144 The assessments are based on monitoring data for the period 2013 -2019 for the water body as a whole. In addition, the predicted impacts at sites within the waterbodies for the period 2000-2020 are modelled on the basis of an observed/expected ratio on the basis of naturalised flows, historical flows (based on actual abstraction) and fully licenced flows.

14.145 For the Granta the overall assessment for invertebrates is high. Two of the individual sampling points did not indicate that abstraction at the fully licenced level would adversely impact ecological status, whereas at the other two locations the Average Score Per Taxon (WHPT-ASPT) reduced from high to good status. All four locations indicate that at historical flow rates, ecological status was generally good or high for the period 2010 -2020. At fully licenced abstraction rates the WHPT-ASPT score would decline from good to moderate at two locations.

14.146 For the River Cam (Audley End to Stapleford) the overall assessment for invertebrates is also high. For abstraction at historical rates, the sampling points all achieve a high or good WHPT-ASPT score. Again, the fully licenced scenario does show a decline at all sampling points, with the Littlebury Bridge declining from good to moderate.

14.147 The River Cam (Stapleford to Hauxton) also shows the status of invertebrates to be high. The single sampling point indicate good status even at the fully licensed scenario.

14.148 The Report also assesses potential effects on SSSIs. There is a risk to some of these from increased abstraction. The ES acknowledges that the Cam water body was classified overall as Moderate for 2019. It states that the reasons it did not achieve 'Good' status is due to a number of factors, including sewage discharge and phosphates. This is reflected in the monitoring data which in all three instances records the status as poor.[149] I also note that the supporting text to Policy CC/7 states that within South Cambridgeshire the majority of rivers are currently of moderate or poor ecological status, but that most of these failures are due to phosphates and man-made alterations to the river and bank form.[9.13. 9.14]

14.149 CW modelled a number of scenarios to assess the level of abstraction required to meet the planned level of customer growth and the resultant flows in surface water bodies. The change in flow was then compared to the level of flow that sets the no deterioration baseline to provide an assessment to be made of the risk of deterioration.

14.150 The modelling outcomes were shared with the EA, but the only information submitted to the Inquiry was a summary table. The EA provided comments based on the modelling and the other parties had an opportunity to respond to these comments.

[149] CD 1.17 chapter 10 paragraphs 10.106 & 10.107

14.151 The EA's conclusions were unchanged by the results of the modelling. It still contends that there is an unacceptable level of risk of environmental deterioration from the combined level of abstraction CW forecasts it needs to meet the demand from existing and new customers up until 2032 when the Grafham Reservoir transfer is due to be operational.

14.152 The various scenarios are set out at table 1 of the EA review of the modelling results. The EA consider that the WRMP30 (S27) provides the best available representation of forecast levels of abstraction by CW. This assumes 100% delivery and success of its planned demand management measures. These measures include the installation of low water usage appliances, low flush toilets, the installation of smart meters, re-use of water through measures such as the installation of water butts, rainwater harvesting, and grey water recycling.

14.153 The scenario assessment shows that in a number of locations, abstraction would be above the level of the proposed licence cap. The EA state that while the licence caps do not come into force until 2030, abstraction levels would exceed the capped levels before this date, therefore the deterioration risk is immediate.

14.154 The assessments are predicted across the entire CW network. This accords with the position in the draft WRMP which explains that the CW region operates as a single water resource zone, and therefore any options that are progressed would impact upon the whole of the CW area.[150]

CWC growth scenario modelling - Abstraction rates (Ml/d)

Name	Lic Number/ID	NDB 2 (S05) 10-15 AVG	WRMP 2030 (S27)	WRMP 2030 50% (S28)	WRMP 2036 (S29)	Current (S30)	WRMP 2030 peak (S31)	WRMP 2030 50% peak (S32)	WRMP 2036 peak (S33)	Current peak (S34)	All Peak (S35)
Abington Pk	6/33/28/*G/0050	0.60	1.00	1.00	0.60	0.75	1.00	1.00	0.60	0.75	1.00
Babraham	6/33/28/*G/0007	6.36	7.17	7.17	4.45	6.12	7.17	7.17	4.45	6.12	8.34
Bretteham	6/33/44/*G/0221	8.43	8.44	8.44	8.44	8.95	8.44	8.44	8.44	8.95	11.75
Croydon	6/33/30/*G/0027	0.67	1.40	1.40	1.40	0.00	1.40	1.40	1.40	0.00	1.40
Dullingham	6/33/34/*G/0203	1.65	3.60	3.60	1.65	1.93	3.60	3.60	1.65	1.93	3.23
Duxford Air	6/33/30/*G/0157	2.25	4.56	4.56	2.25	3.83	4.56	4.56	2.25	3.83	4.45
Duxford Grange	6/33/30/*G/0191	3.09	2.81	2.81	3.09	2.73	2.81	2.81	3.09	2.73	3.41
Euston	6/33/42/*G/0107	4.17	6.00	6.00	4.17	6.94	6.00	6.00	4.17	6.94	7.80
Fleam Dyke	6/33/34/*G/0024	9.74	9.70	10.60	9.74	12.18	9.70	10.60	9.74	12.18	14.33
Fowlmere	6/33/30/*G/0026	3.24	3.25	3.40	3.25	2.91	3.25	3.40	3.25	2.91	3.60
Fulbourn	6/33/34/*G/0179	1.05	1.30	1.30	1.30	1.22	1.30	1.30	1.30	1.22	1.34
Gt Chishill	6/33/30/*G/0192	1.30	1.00	1.00	1.30	0.59	1.00	1.00	1.30	0.59	1.15
Gt Wilbreham	6/33/34/*G/0123	4.08	5.60	5.60	4.08	4.87	5.60	5.60	4.08	4.87	5.19
Heydon	6/33/30/*G/0169	0.97	0.97	0.97	0.97	0.76	0.97	0.97	0.97	0.76	1.09
Hinxton Grange	6/33/27/*G/0039	5.49	5.40	5.40	5.23	5.14	5.40	5.40	5.23	5.14	5.77
Horseheath	6/33/28/*G/0052	0.27	0.87	1.60	0.87	1.32	0.87	1.60	0.87	1.32	0.87
Kingston	6/33/32/*G/0020	0.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.92
Linton	6/33/28/*G/0012	1.22	0.00	0.00	1.48	0.89	0.00	0.00	1.48	0.89	1.48
Lordsbridge	6/33/32/*G/0008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lowerfield	6/33/30/*G/0193	3.09	3.40	3.40	3.09	3.08	3.40	3.40	3.09	3.08	3.38
Melbourn	6/33/30/*G/0156	6.10	6.11	7.00	6.11	5.88	6.11	7.00	6.11	5.88	7.34
Morden Grange	6/33/30/*G/0171	0.95	0.95	0.95	0.95	1.07	0.95	0.95	0.95	1.07	1.51
Rivey	6/33/28/*G/0051	1.44	1.00	1.00	2.01	1.27	1.00	1.00	2.01	1.27	2.01
Sawston	6/33/28/*G/0038	0.97	1.20	1.49	0.98	1.20	1.20	1.49	0.98	1.20	1.49
Westley	6/33/34/*G/0110	7.31	10.60	10.60	7.31	6.91	10.60	10.60	7.31	6.91	7.92
Weston Colville	6/33/34/*G/0179 / 22506 / W-	2.23	3.00	3.00	1.98	2.58	3.00	3.00	1.98	2.58	2.83
	CW total	77.03	89.33	92.29	76.70	83.12	89.33	92.29	76.70	83.12	103.61

14.155 The EA review identifies the water bodies at greatest risk of deterioration at Appendix 3.[151] In the case of Cam (Stapleford to Hauxton Junction) and (Audley End to Stapleford) the risk is described as 'mostly high' and 'high'

[150] Draft WRMP page 9
[151] ID1.33 Appendix 3

respectively. However, the scenario modelling doesn't factor in the planned improvements to the river support scheme in upstream SWBs on the River Cam that Affinity Water intends to deliver by 2025. The risk to the Granta is identified as 'medium', but it is noted that the scenario modelling is not believed to have incorporated the planned licence changes that CW will deliver by 2025. These could reduce the risk scores. [9.13, 9.14]

14.156 I agree with the appellant that there is insufficient evidence to fully understand the inputs to the model. In particular, it is unclear as to the level of growth and rate of growth assessed by the model, and the assumptions underpinning it. I am mindful that NE also raised concerns regarding the impact of water abstraction on the SSSIs, but it relies on the evidence provided by the EA. [6.101, 6.102]

14.157 Overall, the weight to be afforded to the modelling is limited for the reasons given above, and I conclude that the evidence specifically submitted for consideration to the Inquiry does not demonstrate that abstraction is contributing to ecological deterioration.

14.158 Notwithstanding this, it is evident that there is a water supply issue within the Greater Cambridge Area. The Council draws attention to planning applications for over 9,000 homes and 11,000 jobs that are unable to be determined. It also advises that additional development at the Cambridge Biomedical Campus and Life Sciences Campuses risk being put on hold, together with work on the new Joint Local Plan which cannot confidently progress to its next stage.[152] The Council has also written to Ministers seeking a solution to the issue.[153] It is probable that there are similar issues in other Local Planning Authorities across the CW area.

14.159 The EA had concerns with the draft WRMP published in February 2023 and made a number of recommendations and improvements. A revised version was published 29 September 2023 which sought to address the concerns raised by the EA and others during consultation. Whilst the draft WRMP remains under review, it provides further detail of the proposed supply and the assumptions underpinning that supply. The supply baseline includes sustainability changes from the Asset Management Plan 2020-2025 (AMP7) agreed reductions for 'No Deterioration' risk from 2025, and due to time limited licences not being renewed. It includes a minimum buffer (target headroom) into the annual supply/demand balance to ensure that its chosen level of service can be achieved. [6.93]

14.160 It is evident from the EA submissions and the draft WRMP that water resources are a pressing issue within Greater Cambridge. This is recognised by all levels of Government, as well as by the recent WMS. The extent to which the existing levels of abstraction are harming the ecological status of water bodies is unclear, but I note that the draft WRMP states that the EA's WFD classifications show that most chalk streams are not in good health. Potential

[152] ID 1.04 Appendix 1
[153] ID 1.04 Appendix 1

threats to chalk stream ecology include flow pressures, channel modifications and poor water quality.[154][7.116,7.117]

14.161 The draft WRMP acknowledges the Government's plans for Cambridge including substantial development in the biomedical, life sciences and technology sectors.[155] CW is a participant in the Cambridge Delivery Group, initiated by the Government to facilitate the level of growth proposed, and includes a Water Scarcity Working Group to address the water issues which present a barrier to these proposals.

14.162 Using a high growth scenario (growth based on the Cambridge emerging plan) a deficit is identified at the beginning of the WRMP period that cannot be resolved through additional demand management.[156] It is expected that this would be resolved once the Grafham Transfer is operational, but there would be a shortfall between 2030 when the licence caps come into effect and then.

14.163 There is a balance to be struck between the levels of growth proposed and measures to manage the supply and demand for water resources, as well as a need for mitigation measures. This can be managed by reducing demand and/or increasing supply. The balance and any mitigation measures are a strategic matter for the WRMP, as confirmed by NPPF paragraph 20(b), and is not a matter for this appeal. The preferred approach may have significant consequences for Greater Cambridge and the Government's vision for this area.

14.164 There is agreement between the Council and the appellant that the proposal would comply with Policies CC/4 and CC/7 of the Local Plan. Paragraph (b) of Policy CC/7 requires proposals to demonstrate that they would not harm the quality of ground, surface or water bodies. The EA suggests that Policy CC/7 requires a cumulative assessment of any harm. Neither the policy wording, nor the supporting text seek a cumulative assessment. Notwithstanding this the issue of water supply and quality is a material consideration. [6.78, 6.79, 7.115]

14.165 The appellant has undertaken a quantitative assessment to ensure water efficiency. These measures include a typical residential water consumption of 89 litres per person per day by comparison with the 125 litres per person per day in the existing WRMP. The commercial accommodation would achieve a BREEAM level of 'Excellent', with 5 credits for water efficiency. These measures include the provision of grey water recycling within each building and would be secured by condition, as well as accord with the approach within the WMS. [4.14, 6.94, 6.95, 9.7]

14.166 Water resources should ordinarily be a strategic matter and not considered as part of a planning application. In this instance, the development plan was adopted in 2018, and it would seem that the concerns in relation to water quality were not known at that date. Indeed, even the EA's initial response to the appeal proposal did not identify this as an issue. The Council is of the view that the issue of water stress has been appropriately considered by applying

[154] ID1.37 Page 42
[155] ID 1.37 Section 11.6
[156] ID 1.37 Page 157

Policies CC/4 and CC/7 relating to water efficiency and water quality issues. This is on the basis of an appropriate package of mitigation being secured through agreed planning conditions. [7.118, 7.119, 9.8]

14.167 The proposal would comply with the relevant development plan policies and the NPPF in so far as they relate to water supply. The water efficiency of the appeal proposal would significantly exceed the standards sought by the development plan. With the proposed measures in place, the proposal would amount to 0.22% of water demand across the CW area. Therefore, in the specific case of this appeal, where I have found the absence of any substantive evidence of ecological harm due to increased abstraction rates, I conclude that the proposal, taken by itself, would not harm water supply or quality.[6.82, 6.84, 9.21]

14.168 The EA is also concerned with the cumulative effect of the proposal and other development within the CW area on the availability of a sustainable water supply. The draft WRMP identifies a shortfall between demand and supply prior to the Grafham transfer in 2031/32, some of which is proposed to be accommodated by demand supply measures. To reduce the risk of deterioration the EA contends that the amount of overall growth in Cambridgeshire would need to be reduced, or the amount of water it needs would need to be reduced. One means of achieving this would be through later delivery of phases of developments. [9.33]

14.169 I agree with the EA that water supply and quality is a material consideration in this appeal. I found above that the proposal would not in itself harm water quality or water resources. However, the cumulative effect of the appeal proposal together with other committed or anticipated development would add to the demand for water, and it may be the case that a sustainable supply of water for the CW area will not be available until after the Grafham Transfer is operational.

14.170 The statutory process for balancing water supply and demand is set out in the SoCG agreed between the appellant and the EA. This process involves the production of the WRMP, updated every 5 years. The EA's position in relation to the revised WRMP is unknown since it was published relatively recently. [6.106, 6.92]

14.171 The appellant refers to *R(An Taisce) v SSECC [2014] EWCA Civ 1111*[157] where the Court of Appeal concluded that the Secretary of State was entitled to have regard to the statutory regime which dealt with design and safety issues. The appellant submits that a similar consideration applies in this appeal, namely that the EA and CW are required to undertake a statutory process which ends with the adoption of a WRMP in 2024. The WRMP feeds into the production of development plans for the area including the Greater Cambridge Plan and the NECAAP. [6.92]

14.172 The recent WMS acknowledges the pressure on water supply within Cambridge and proposes a review of building regulations to allow local planning authorities to introduce tighter water efficiency standards in new homes. Within

[157] ID 1.30 paragraphs 46 -51

areas of serious water stress it encourages local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance. As acknowledged by all parties, including the Environment Agency, the measures proposed by the appellant exceed those within the Local Plan. [9.7]

14.173 It is a matter for the Secretary of State to determine whether the water supply and quality issues within Cambridge are so pressing that their resolution cannot be managed by the usual statutory process and any initiatives emerging from the Water Scarcity Working Group. He will need to consider whether the statutory process and other measures in place in respect of water supply are sufficiently robust to ensure that the proposal, together with other development, would avoid placing an unacceptable demand on water resources and potentially harm ecological interests.

14.174 Mitigation in terms of water resources is secured through conditions 14, 15 and 46. Should the Secretary of State conclude that water demand would have unacceptable consequences for water supply and quality he may wish to consider imposing an additional condition that would delay the occupation of the development until the WRMP is approved or the Grafham Transfer is operational.

14.175 The benefit of imposing such a condition must be balanced against the delay in delivering the benefits of the proposal, particularly the economic benefits, and the delivery of housing. In my view such an approach would have the potential to stall development within the Greater Cambridge area as a whole, perhaps over a prolonged and unknown period of time, since the entire area is served by CW. This uncertainty could also have implications for the future growth of Greater Cambridge, including at locations such as Cambridge University and the Cambridge Biomedical Campus which is a world-renowned centre of excellence and research for Life Sciences.

14.176 For these reasons I do not consider such a condition to be necessary. However, should the Secretary of State reach a different conclusion on this matter, I agree with the Council that it is necessary to limit the occupation of the commercial floorspace as well as the residential accommodation. The suggested wording for such a condition is included at Annex D (Condition 49).

Benefits of the proposal

14.177 The proposed development would deliver a number of economic, social, and environmental benefits. There is broad agreement between the Council and the appellant as to the weight to be afforded to a number of the benefits. [6.109]

Economic

14.178 I found above that there is a need for sustainably located office and laboratory space within Cambridge over both the short and medium term. As acknowledged by the Council, the proposed development would be likely to be let if built. The appellant suggests that great weight should be given to this benefit, whereas the Council's view is that it attracts considerable weight. The reason the Council suggest a lesser level of weight is that it does not consider

the delivery of this site to be critical to the need for such floorspace since there is other floorspace in the pipeline. However, there is no ceiling for the delivery of office and laboratory floorspace, the site is identified by Policy E/9 as a suitable location for cluster development and it occupies a sustainable location close to Cambridge North Station and forms part of an allocated site. Moreover, I found above that in the absence of the floorspace delivered by the proposal there would be a shortfall in the medium and short term. I therefore agree with the appellant that great weight should be afforded to this benefit.

14.179 The benefits of clustering and the importance to the knowledge intensive industries in Cambridge are widely recognised. Paragraph 83 of the NPPF advises that planning decisions should provide for clusters or networks of knowledge and data-driven, creative or high technology industries.

14.180 The proposal would provide over 4,300 jobs once complete and 2000 roles during construction. I accept that no single site or building is critical to meeting the employment needs of the area, nor is delivery of a particular quantum of floorspace on this site critical to meeting anticipated employment needs over the plan period or to the success of the local economy. The appellant states that the social and local economic value created through the total five-year construction period could be up to £70.6m which would be approximately 18.5% of the construction costs and following occupation could be as high as £61.5m in the first year and £600.9m over 10 years of occupation.[158] Whilst these figures have not been verified it is evident that the economic benefits arising from the proposal would be considerable.

14.181 I also note the importance the Government attaches to the Life Sciences sector within Cambridge. The proposal would have the potential to add to the economic prosperity of the Greater Cambridge area as a whole, as well as provide a return on the public investment in Cambridge North Station. [6.109]

Social

14.182 The Council has a 6.1-year housing land supply, and it is not disputed by the appellant that it would continue to have a rolling five year housing land supply when calculated by the standard method. The appeal site occupies a highly sustainable location. Nevertheless, as the parties agree, the delivery of housing and affordable housing is a benefit of considerable weight. [7.105]

14.183 The proposal would include attractive, well designed public open spaces at Chesterton Square and the Piazza. It would also deliver a Wild Park located at the northern part of the site. the Council accepts that both of these would be beneficial but consider that the weight to be attributed to the Wild Park should be reduced since it does not consider it to be fully integrated within the design due to the need for residents to cross two roads to use it. I found above that the Wild Park would be located close to the proposed dwellings and whilst it would be necessary to cross Milton Avenue and Cowley Road, the traffic using these roads would be limited, and in the case of Milton Avenue a controlled

[158] CD 8.46 paragraphs 7.46 and 7.47

crossing would be provided. I therefore disagree that the weight attributed to the benefit provided by the Wild Park should be reduced.

14.184 The provision of outdoor space within the public realm for recreation and socialising, together with the indoor and outdoor space within the buildings for collaboration, would support well-being and social inclusion. The phased nature of the proposed development provides for 'meanwhile' uses. These are set out at ID 1.16 and would be secured by Schedule 3 of the s106 Agreement. They include temporary social space, with seating, food vans and night-time lighting, with landscaping provided by Community gardens and trees and planting beds of Open Mosaic species in upcycled planters. Other social benefits include the provision of the community hall within the residential blocks, and the provision of shops and services for residents of Chesterton.[6.112, 7.109]

Environmental

14.185 The proposal would reuse brownfield land in accordance with paragraph 120(c) of the NPPF. It would occupy a highly sustainable location and would prioritise non-motorised transport. It would also deliver in excess of a 80% BNG.

14.186 The proposed development will deliver a scheme with BREEAM 2018 Excellent certification as a minimum, with an aspiration to target 'Outstanding'. It would also include exemplary water efficiency measures within both the residential and commercial accommodation. Taken together with the SuDS proposed and the prioritisation of non-motorised and public transport the proposal would strongly support the Council's response to the climate emergency. The provision of about 80.27% BNG would be a further significant benefit of the proposal. [6.110, 7.110,7.111]

Heritage Balance

14.187 I have found above that the proposal would cause harm to the Riverside and Stourhead and Fen Ditton Conservation Areas. In both cases the harm would be less than substantial and towards the lowest end of the scale. I am however required to give great weight to this harm and in accordance with paragraph 202 of the NPPF the harm must be weighed against the public benefits of the proposal.

14.188 The public benefits of the proposal include the very considerable economic benefits in terms of the delivery of jobs, employment space and the contribution to the wider economy. The social benefits, particularly the delivery of housing and affordable housing also attract very substantial weight. The environmental benefits, including the re-use of brownfield land, the accessible location of the appeal site, and the response to climate change through the prioritisation of non-motorised transport and the environmental measures embedded within the scheme also attract very considerable weight. I conclude that when weighed against the very low level of harm to both conservation areas the balance is clearly in favour of the proposal.

Planning Balance

14.189 Planning law requires that decisions are made in accordance with the development plan unless material considerations indicate otherwise. I have found above that the proposal would give rise to some localised harm to the character and appearance of the surrounding landscape but would comply with Policy NH/2 as a whole. There would also be some harm to heritage assets, contrary to Policy NH/14, but, as set out above, this is outweighed by the public benefits of the proposal. Balanced against this the proposal would comply with Policy SS/4 and the Government's vision for Cambridge 2040 in that it would help to deliver a new Urban Quarter with a focus on employment, the provision of jobs and homes would accord with Policies S/5 and E/9. In this regard it would also be consistent with the Government's Cambridge 2040 Vision, as referenced in the WMS. [4.13,6.9,7.127]

14.190 The proposal would also deliver high quality buildings within an attractive public realm as sought by Policy HQ/1 and National Planning Policy. It would be a sustainable development, in that it would use brownfield land, prioritise the use of non-motorised and public transport, minimise energy and water consumption, use SuDS. In this regard it would comply with Policies CC/1, CC/2, CC/3, CC/8, CC/9, TI/2, and TI/3. The proposal would also comply with Policy NH/4 in terms of biodiversity and deliver a substantial BNG and would comply with Policies CC/4 and CC/7, in terms of water resources. I therefore consider that the proposal would comply with the development plan as a whole.

14.191 The proposal would also further the Government's intention to boosting the supply of commercial development, in particular laboratory space, to supporting Research and Development and investment in high value industries across England, such as the life sciences and advanced manufacturing sectors in the Oxford-Cambridge corridor.

14.192 I agree with the EA that water supply and quality is a material consideration in this appeal. I found above that the proposal would not in itself harm water quality or water resources. However, the cumulative effect of the appeal proposal together with other committed or anticipated development would add to the demand for water, and it may be the case that a sustainable supply of water for the CW area will not be available until after the Grafham Transfer is operational.

14.193 For the reasons given above, should the Secretary of State consider that the statutory process and other measures in place in respect of water supply are not sufficiently robust to ensure that the proposal, together with other development, would avoid placing an unacceptable demand on water resources and potentially harm ecological interests, he may wish to consider imposing a condition to delay the occupation of development until measures are in place to resolve water supply requirements.

15 Recommendation

15.1 I recommend that planning permission is granted subject to the planning obligations within the submitted S106 agreement and conditions at appendix A.

15.2 Should the Secretary of State take the view that the water supply and quality issues are an over-riding consideration and are unlikely to be resolved by the existing statutory process, he may wish to consider imposing the above condition that would have the effect of delaying the occupation of the proposed buildings until the WRMP has been approved, and measures put in place to resolve water supply requirements.

Lesley Coffey

PLANNING INSPECTOR

Annex A

Appearances

For the Appellant

Rupert Warren KC

He Called:

Mark Nettleton BEng (Hons) MCIHT

Max Bryan MA BArch (Hons) MRICS

Friedrich Ludewig Dip Arch AA (Hons), RIAI

Greg Willis BA (Hons) Dip Arch (Cantab), RIBA ARB

Robert Myers MA (Cantab), PGDip LA, CMU, MSGD

Jeremy Smith BSc (Hons), Dip LA, CMU

Alison Caldwell CEng MICE, MEng (Hons)

Mike Barker BSc MSc FCIEEM CEnv

Jon Burgess PhD MA (Arch Can) BPI BA (Hans) Dip Can MRTPI IHBC

Mike Derbyshire BA (Hans) MRTPI

Peter Seaborn

Alison Wright

For the Council

Ben Du Feu and Jack Barber

instructed by

Solicitor for South Cambridgeshire District Council

They Called:

Annemarie de Boom	M.Sc. (Hons) (Urban Design, Delft University of Technology, The Netherlands) Director, deBOOM Urban Design
Nigel Wakefield	B.A. (Hons) BTP, Dip LA, MA UD, MRTPI Managing Director, Node
Christian Brady	B.A. (Hons), PgDip (Town & Regional Planning)

	Historic Environment Team Leader, Greater Cambridge Shared Planning
Matthew Kinghan	B.Sc. (Hons) M.Sc. (, LSE Assoc. MRTPI MIED
	Director, Planning at Iceni Projects
Fiona Bradley	Bachelor of Resource and Environmental Planning, PgDip (UK Planning Law and Practice)
	Interim TeamLeader Support, Greater Cambridge Shared Planning

Other attendees:

Stephen Kelly	BTP, MBA, MRTPI
	Joint Director of Planning and Economic Development Greater Cambridge Shared Planning
Philippa Kelly	B.Sc (Hons), M.Sc, DipTp, MRTPI –
	Strategic Sites Manager, Greater Cambridge Shared Planning
Jonathan Dixon	B.A. (Hons), MTPL), MRTPI –
	Planning Policy Manager, Greater Cambridge Shared Planning
Richard Pitt	LLB (Hons), PgDip Legal Practice, - Principal Lawyer (Planning), 3C Shared Services - Legal Practice

Cambridge Past Present and Future (Rule 6 Party)

James Littlewood

Sarah Nicholas

Cambridge County Council

Tam Parry Principal Engineer Highways

Jez Tuttle Team Manager Highways

Environment Agency

Keira Murphy _Planning Specialist, Team (East Anglia)

James Bax Water Resources Programme Manager (East Anglia)

Iain Page Water Resources Specialist (East Anglia)

Carol Bolt Senior Specialist (National Legal Services)

Other Parties

Mike Bodkin on behalf of Chesterton Partnership

Councillor Hazel Smith

Mrs Susan O'Connor

Kathryn Waldren Sphere 25 on behalf of Trinity College Cambridge

Annex B

DOCUMENTS SUBMITTED DURING THE INQUIRY

0	Appellant's opening submissions
1	Cambridge Past Present and Future Opening Submissions
2	South Cambridgeshire District Council Opening Submissions
3	PJA Note on Parking at Cambridge Central Station
4	LPA updated position on Water Resources (15.06.23)
5	Draft Agenda for Water Resources Roundtable
6	Note on parking and sustainable travel on behalf of Trinity College
7	Natural England Letter dated 25 June 2023 on Greater Cambridge Integrated Water Management Study
8	Natural England Letter On Greater Cambridge Local Plan Regulation 19 Preferred Options 2021
9	Natural England Letter To Secretary Of State On Anglian Water dWRMP
10	Natural England Letter To Inspector dated 16 June 2023
11	Submissions on behalf of the Chesterton Partnership
12	Comments on s.106 Heads of Terms on behalf of the Chesterton Partnership
13	Site Plan submitted by the Appellant
14	Building S04 (1 Milton Avenue) plan submitted by the Appellant
15	Building S06 (1 Station Row) plan submitted by the Appellant
16	Landscape Delivery and Management and Meanwhile uses Note submitted by the Appellant
17	Revised Draft Planning Conditions dated 19 June 2023
18	Building Height Comparison Plan submitted by the Appellant
19	Note on Site and Rail Aggregates Depot Interaction dated 20 June 2023
20	Note regarding various Local Plan matters dated 22 June 2023 submitted by the Council
21	Habitat Regulations Assessment AAP Note Report November 2021
22	Habitat Regulations Assessment AAP Note Report June 2023
23	Cambridge Past Present and Future Closing Submissions
24	South Cambridgeshire District Council Closing Submissions
25	Appellant's closing submissions
26	Suggested condition regarding occupation of residential accommodation and Water Resources Management Plan
27	Note on supply of Office Accommodation dated 23 June 2023 submitted by the Appellant
28	Note on Need for Employment Land dated June 2023 submitted by the Council
29	Draft s106 Agreement and plans
30	The Queen on the Application of An Taisce (The National Trust for Ireland) v The Secretary of State for Energy and Climate Change v NNB Generation Company Limited
31	Executed S106 Agreement dated 13 July 2023
32	Revised Draft Planning Conditions dated 11 July 2023
33	

Annex C

Core Documents

1.	Documents, plans and drawings submitted with the original application	
CD1.00a	Planning Application Cover Letter	14 June 2022
CD1.00b	Full Application Form	14 June 2022
CD1.00c	Outline Application Form	14 June 2022
CD1.01	Design Access Statement Cover	June 2022
CD1.02	Design Access Statement 1.0 Introduction	June 2022
CD1.03	Design Access Statement 2.0 Site Context, Analysis and Brief	June 2022
CD1.04	Design Access Statement 3.0 Development Vision	June 2022
CD1.05	Design Access Statement 4.0 Consultation Process	June 2022
CD1.06a	Design Access Statement 5.0 Masterplan Massing Scale Layout Part 1 of 5	June 2022
CD1.06b	Design Access Statement 5.0 Masterplan Massing Scale Layout Part 2 of 5	June 2022
CD1.06c	Design Access Statement 5.0 Masterplan Massing Scale Layout Part 3 of 5	June 2022
CD1.06d	Design Access Statement 5.0 Masterplan Massing Scale Layout Part 4 of 5	June 2022
CD1.06e	Design Access Statement 5.0 Masterplan Massing Scale Layout Part 5 of 5	June 2022
CD1.07	Design Access Statement 6.1 Triangle Site S08 and S09	June 2022
CD1.08a	Design Access Statement 6.2 Residential Site S11- S21 Part 1 of 5	June 2022

CD1.08b	Design Access Statement 6.2 Residential Site S11- S21 Part 2 of 5	June 2022
CD1.08c	Design Access Statement 6.2 Residential Site S11- S21 Part 3 of 5	June 2022
CD1.08d	Design Access Statement 6.2 Residential Site S11- S21 Part 4 of 5	June 2022
CD1.08e	Design Access Statement 6.2 Residential Site S11- S21 Part 5 of 5	June 2022
CD1.09a	Design Access Statement 7.1 One Milton Avenue Part 1 of 3	June 2022
CD1.09b	Design Access Statement 7.1 One Milton Avenue Part 2 of 3	June 2022
CD1.09c	Design Access Statement 7.1 One Milton Avenue Part 3 of 3	June 2022
CD1.10a	Design Access Statement 7.2 1 and 3 Station Row Part 1 of 4	June 2022
CD1.10b	Design Access Statement 7.2 1 and 3 Station Row Part 2 of 4	June 2022
CD1.10c	Design Access Statement 7.2 1 and 3 Station Row Part 3 of 4	June 2022
CD1.10d	Design Access Statement 7.2 1 and 3 Station Row Part 4 of 4	June 2022
CD1.11a	Design Access Statement 7.3 Mobility Hub Part 1 of 3	June 2022
CD1.11b	Design Access Statement 7.3 Mobility Hub Part 2 of 3	June 2022
CD1.11c	Design Access Statement 7.3 Mobility Hub Part 3 of 3	June 2022
CD1.12	Design Access Statement 8.0 Landscape	June 2022
CD1.13	Design Access Statement 9.0 Transport Links	June 2022
CD1.14	Design Access Statement 10.0 Inclusive Design Statement	June 2022
CD1.15a	Design Access Statement 11.0 Appendix Part 1 of 2	June 2022

CD1.15b	Design Access Statement 11.0 Appendix Part 2 of 2	June 2022
CD1.16	Planning Statement (including first draft Heads of Terms)	13 June 2022
CD1.17	Environmental Statement Volume 1 – Main report	June 2022
CD1.18a	Environmental Statement Volume 2 Appendix 2.1 Scoping Report	25 November 2021
CD1.18b	Environmental Statement Volume 2 Appendix 2.2 Scoping Opinion	9 February 2022
CD1.19a	Environmental Statement Volume 2 Appendix 4.1 Plans and Drawings A1 size Part 1 of 2	27 May 2022
CD1.19b	Environmental Statement Volume 2 Appendix 4.1 Plans and Drawings A1 size Part 2 of 2	27 May 2022
CD1.20	Environmental Statement Volume 2 Appendix 4.2 Outline Construction Environmental Management Plan	
CD1.21	Environmental Statement Volume 2 Appendix 6.1 Construction Phase Assessment including Dust Risk Assessment	
CD1.22	Environmental Statement Volume 2 Appendix 6.2 Detailed Dispersion Modelling Assessment Method	
CD1.23	Environmental Statement Volume 2 Appendix 7.1 Relevant Expertise and Qualifications	
CD1.24	Environmental Statement Volume 2 Appendix 7.2 Policy, Guidance and Legislation	
CD1.25	Environmental Statement Volume 2 Appendix 7.3 Carbon Assessment Results	
CD1.26	Environmental Statement Volume 2 Appendix 7.4 In-Combination Climate Change Impact Assessment Results	

CD1.27	Environmental Statement Volume 2 Appendix 7.5 Climate Change Resilience Assessment Results	
CD1.28	Environmental Statement Volume 2 Appendix 7.6 Design Guide Input	
CD1.29	Environmental Statement Volume 2 Appendix 8.1 Heritage Assets Map A3 size	April 2022
CD1.30	Environmental Statement Volume 2 Appendix 8.2 Historic Maps	
CD1.31	Environmental Statement Volume 2 Appendix 8.3 Cultural Heritage Statement	May 2022
CD1.32	Environmental Statement Volume 2 Appendix 9.1 Ecology Survey Report CB4 Phase 2	February 2022
CD1.33	Environmental Statement Volume 2 Appendix 9.2 Ecological Design Strategy	7 June 2022
CD1.34	Environmental Statement Volume 2 Appendix 9.3 Biodiversity Net Gain Report Phase 2	
CD1.35a	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 1 of 8	6 June 2022
CD1.35b	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 2 of 8	6 June 2022
CD1.35c	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 3 of 8	6 June 2022
CD1.35d	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 4 of 8	6 June 2022
CD1.35e	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 5 of 8	6 June 2022
CD1.35f	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 6 of 8	6 June 2022

CD1.35g	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 7 of 8	6 June 2022
CD1.35h	Environmental Statement Volume 2 Appendix 10.1 FRA and Drainage Strategy Parts 8 of 8	6 June 2022
CD1.36	Environmental Statement Volume 2 Appendix 10.2 Water Resource Addendum	25 February 2022
CD1.37	Environmental Statement Volume 2 Appendix 11.1 Cam North HUDU	April 2017
CD1.38	Environmental Statement Volume 2 Appendix 11.2 Health and Wellbeing Policy	
CD1.39	Environmental Statement Volume 2 Appendix 11.3 Study Area Health Profiles	
CD1.40	Environmental Statement Volume 2 Appendix 12.1 LVIA Methodology	
CD1.41a	Environmental Statement Volume 2 Appendix 12.2 Part 1 of 2 of Mapping	13 May 2022
CD1.41b	Environmental Statement Volume 2 Appendix 12.2 Part 2 of 2 of Mapping	13 May 2022
CD1.42	Environmental Statement Volume 2 Appendix 12.3 Viewpoints	
CD1.43a	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 1 of 9	9 June 2022
CD1.43b	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 2 of 9	9 June 2022
CD1.43c	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 3 of 9	9 June 2022
CD1.43d	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 4 of 9	9 June 2022
CD1.43e	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 5 of 9	9 June 2022
CD1.43f	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 6 of 9	9 June 2022

CD1.43g	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 7 of 9	9 June 2022
CD1.43h	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 8 of 9	9 June 2022
CD1.43i	Environmental Statement Volume 2 Appendix 12.4 Visualisations Part 9 of 9	9 June 2022
CD1.44	Environmental Statement Volume 2 Appendix 12.5, Correspondence	
CD1.45	Environmental Statement Volume 2 Appendix 13.1, Daylight and Sunlight Assessment	5 May 2022
CD1.46	Environmental Statement Volume 2 Appendix 13.2 Obstructive Lighting Assessment	5 May 2022
CD1.47	Environmental Statement Volume 2 Appendix 13.3 Reflective Solar Glare Assessment	5 May 2022
CD1.48	Environmental Statement Volume 2 Appendix 14.1 Noise and Vibration Technical Appendices	
CD1.49	Environmental Statement Volume 2 Appendix 14.2 NIA for Residential Planning	25 May 2022
CD1.50a	Environmental Statement Soils and Groundwater Appendix 16.1 Phase 1 Part 1 of 9	April 2022
CD1.50b	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 2 of 9	April 2022
CD1.50c	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 3 of 9	April 2022
CD1.50d	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 4 of 9	April 2022
CD1.50e	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 5 of 9	April 2022

CD1.50f	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 6 of 9	April 2022
CD1.50g	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 7 of 9	April 2022
CD1.50h	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 8 of 9	April 2022
CD1.50i	Environmental Statement Volume 2 Soils and Groundwater Appendix 16.1 Phase 1 Part 9 of 9	April 2022
CD1.51	Environmental Statement Volume 2 Appendix 16.2 Prob, Cons, Risk	
CD1.52	Environmental Statement Volume 2 Appendix 16.3 Sensitivity Magnitude Significance	
CD1.53	Environmental Statement Volume 2 Appendix 16.4 CSM	
CD1.54a	Environmental Statement Volume 2 Appendix 17.1 Transport Assessment Part 1 of 2	
CD1.54b	Environmental Statement Volume 2 Appendix 17.1 Transport Assessment Part 2 of 2	
CD1.55	Environmental Statement Volume 2 Appendix 17.2 Outline Travel Plan	27 May 2022
CD1.56	Environmental Statement Volume 2 Appendix 17.3 Low Emission Strategy	11 April 2022
CD1.57	Environmental Statement Volume 2 Appendix 18.1 CFD Analysis	
CD1.58	Environmental Statement Volume 3 – Non-Technical Summary	
CD1.59	Office and Laboratory Occupational Market Update June 2022	June 2022
CD1.60	Build to Rent Market Report - Private Rented Sector June 2022	April 2022
CD1.61	Cambridge Retail and Leisure Update	June 2022

CD1.62a	Landscape and Open Space Report Part 1 of 20	June 2022
CD1.62b	Landscape and Open Space Report Part 2 of 20	June 2022
CD1.62ci	Landscape and Open Space Report Part 3A of 20	June 2022
CD1.62cii	Landscape and Open Space Report Part 3B of 20	June 2022
CD1.62d	Landscape and Open Space Report Part 4 of 20	June 2022
CD1.62e	Landscape and Open Space Report Part 5 of 20	June 2022
CD1.62f	Landscape and Open Space Report Part 6 of 20	June 2022
CD1.62g	Landscape and Open Space Report Part 7 of 20	June 2022
CD1.62h	Landscape and Open Space Report Part 8 of 20	June 2022
CD1.62i	Landscape and Open Space Report Part 9 of 20	June 2022
CD1.62j	Landscape and Open Space Report Part 10 of 20	June 2022
CD1.62k	Landscape and Open Space Report Part 11 of 20	June 2022
CD1.62l	Landscape and Open Space Report Part 12 of 20	June 2022
CD1.62m	Landscape and Open Space Report Part 13 of 20	June 2022
CD1.62n	Landscape and Open Space Report Part 14 of 20	June 2022
CD1.62o	Landscape and Open Space Report Part 15 of 20	June 2022
CD1.62p	Landscape and Open Space Report Part 16 of 20	June 2022
CD1.62q	Landscape and Open Space Report Part 17 of 20	June 2022

CD1.62r	Landscape and Open Space Report Part 18 of 20	June 2022
CD1.62s	Landscape and Open Space Report Part 19 of 20	June 2022
CD1.62t	Landscape and Open Space Report Part 20 of 20	June 2022
CD1.63	Statement of Community Involvement	June 2022
CD1.64	Public Art Strategy	26 May 2022
CD1.65	Arboricultural Impact Assessment Report	June 2022
CD1.66	Odour Statement	June 2022
CD1.67	Utilities Statement	24 May 2022
CD1.68	Energy Statement for 1 Milton Avenue and 1-3 Station Row Rev 02	23 May 2022
CD1.69	Energy Statement for 1 Milton Avenue and 1-3 Station Row Rev 03	14 June 2022
CD1.70	Energy Strategy	June 2022
CD1.71	Preliminary Operational Waste Management Plan	June 2022
CD1.72	Site Waste Management and Materials Management Plan Rev02	May 2022
CD1.73	Archaeology Desk-Based Assessment	June 2022
CD1.74a	Planning Access Statement Part 1 of 7	May 2022
CD1.74b	Planning Access Statement Part 2 of 7	May 2022
CD1.74c	Planning Access Statement Part 3 of 7	May 2022
CD1.74d	Planning Access Statement Part 4 of 7	May 2022
CD1.74e	Planning Access Statement Part 5 of 7	May 2022
CD1.74f	Planning Access Statement Part 6 of 7	May 2022
CD1.74g	Planning Access Statement Part 7 of 7	May 2022
CD1.75	Application Site Location Plan 1-2500 A1 size	239-ACME-PLA-S00-0010 June 2022
CD1.76	Site Plan A1 size 27 May 2022	239-ACME-PLA-S00-0011

		June 2022
CD1.77a	Parameter Plan Existing Site Conditions Application Plan 1 of 9 A1 size	239-ACME-PLA-S01-0101 27 May 2022
CD1.77b	Parameter Plan Building Layout and Application Type 2 of 9 A1 size	239-ACME-PLA-S01-0102 27 May 2022
CD1.77c	Parameter Plan Maximum Building Envelope Basements 3 of 9 A1 size	239-ACME-PLA-S01-0103 27 May 2022
CD1.77d	Parameter Plan Maximum Building Envelope Ground Floor 4 of 9 A1	239-ACME-PLA-S01-0104 27 May 2022
CD1.77e	Parameter Plan Maximum Building Envelope Typical Level 5 of 9 A1 size	239-ACME-PLA-S01-0105 27 May 2022
CD1.77f	Parameter Plan Building Heights Plan 6 of 9 A1 size	239-ACME-PLA-S01-0106 27 May 2022
CD1.77g	Parameter Plan Proposed Uses Ground Floor 7 of 9 A1 size	239-ACME-PLA-S01-0107 27 May 2022
CD1.77h	Parameter Plan Access 8 of 9 A1 size	239-ACME-PLA-S01-0108 27 May 2022
CD1.77i	Parameter Plan Landscape and Open Spaces 9 of 9 A1 size	239-ACME-PLA-S01-0109 27 May 2022
CD1.78	Landscape Masterplan A3 size	630_01(MP)001 P1 10 June 2022
CD1.79	Ecology Strategy Ground Floor (Plan) A3 size	630_01(MP)002 P1 27 May 2022
CD1.80	Ecology Strategy Roof (Plan) A3 size	630_01(MP)003 P1 27 May 2022

CD1.81	Public Open Space Provision (Plan) A3 size	630_01(MP)004 P1 June 2022
CD1.82	Hard Landscape Strategy (West) (Plan) A3 size	630_01(MP)005 P1 27 May 2022
CD1.83	Hard Landscape Strategy (East) (Plan) A3 size	630_01(MP)006 P1 27 May 2022
CD1.84	Hard Landscape Strategy (Wild Park) (Plan) A3 size	630_01(MP)007 P1 27 May 2022
CD1.85	Tree strategy A3 size	630_01(MP)008 P1 27 May 2022
CD1.86	Planting Strategy (West) (Plan) A3 size	630_01(MP)009 P1 27 May 2022
CD1.87	Planting Strategy (East) (Plan) A3 size	630_01(MP)010 P1 27 May 2022
CD1.88	Levels and drainage (West) (Plan) A3 size	630_01(MP)011 P1 10 June 2022
CD1.89	Levels and drainage (East) (Plan) A3 size	630_01(MP)012 P1 1 June 2922
CD1.90	Levels and Drainage (Wild Park) (Plan) A3 size	630_01(MP)013 P1 1 June 2022
CD1.91	Attenuation strategy A3 size	630_01(MP)014 P1 27 May 2022
CD1.92	Furniture Strategy (West) (Plan) A3 size	630_01(MP)015 P1 27 May 2022
CD1.93	Furniture Strategy (East) (Plan) A3 size	630_01(MP)016 P1 27 May 2022
CD1.94	Furniture Strategy (Wild Park) (Plan) A3 size	630_01(MP)017 P1 27 May 2022
CD1.95	Roof Strategy (Plan) A3 size	630_01(MP)019 P1 27 May 2022

CD1.96	Root Cell Extents (Plan) A3 size	630_01(MP)020 P1 27 May 2022
CD1.97a	102 Milton Avenue 1 of 2 (Plan) A3 size	630_01(MP)101 P1 27 May 2022
CD1.97b	102 Milton Avenue 2 of 2 (Plan) A3 size	630_01(MP)102 P1 27 May 2022
CD1.98a	103 Chesterton way 1 of 3 (Plan) A3 size	630_01(MP)103 P1 27 May 2022
CD1.98b	104 Chesterton way 2 of 3 (Plan) A3 size	630_01(MP)104 P1 27 May 2022
CD1.98c	105 Chesterton way 3 of 3 (Plan) A3 size 27	630_01(MP)105 P1 27 May 2022
CD1.99	106 Cowley Road North (Plan) A3 size	630_01(MP)106 P1 27 May 2022
CD1.100	107 Cowley Road East (Plan) A3 size	630_01(MP)107 P1 27 May 2022
CD1.101	108 The Link (Plan) A3 size	630_01(MP)108 P1 27 May 2022
CD1.102	109 Bramblefields Way (Plan) A3 size	630_01(MP)109 P1 27 May 2022
CD1.103	201 1 Milton Avenue and Milton Walk (Plan) A3 size	630_01(MP)201 P1 27 May 2022
CD1.104	202 Chesterton Square (Plan) A3 size	630_01(MP)202 P1 27 May 2022
CD1.105	203 Station Row (Plan) A3 size	630_01(MP)203 P1 27 May 2022
CD1.106	204 Station Row Features (Plan) A3 size	630_01(MP)204 P1 27 May 2022
CD1.107	205 Piazza (Plan) A3	630_01(MP)205 P1 27 May 2022

CD1.108	206 Station Row Passage (Plan) A3 size	630_01(MP)206 P1 27 May 2022
CD1.109	207 Chesterton Passage (Plan) A3 size	630_01(MP)207 P1 27 May 2022
CD1.110	208 Cowley Circus (Plan) A3 size	630_01(MP)208 P1 27 May 2022
CD1.111	209 Wild Park (Plan) A3 size	630_01(MP)209 P1 27 May 2022
CD1.112	210 Typical Meanwhile Use for Pocket Park (Plan) A3 size	630_01(MP)210 P1 27 May 2022
CD1.113	212 Roof Garden - Labs (Plan) A3 size	630_01(MP)212 P1 27 May 2022
CD1.114	213 Roof Garden - 1 Milton Avenue (Plan) A3 size	630_01(MP)213 P1 27 May 2022
CD1.115	301 Residential Masterplan A3 size	630_01(MP)301 P1 27 May 2022
CD1.116	304 Play Areas- LEAP and LAP (Plan) A3 size	630_01(MP)304 P1 27 May 2022
CD1.117	305 Play Areas- Natural Play (Plan) A3 size	630_01(MP)305 P1 27 May 2022
CD1.118	306 Play Areas -Wild Park (Plan) A3 size	630_01(MP)306 P1 27 May 2022
CD1.119	307 Residential Roof Garden Masterplan (Plan) A3 size	630_01(MP)307 P1 27 May 2022
CD1.120	308 Roof Garden Features (Plan) A3 size	630_01(MP)308 P1 28 April 2022
CD1.121	Typical Tree Pit in Hard Landscape A3 size	630_01(CD)001 P1 May 2022
CD1.122	Typical Tree Pit in Soft Landscape A3 size	630_01(CD)002 P1 May 2022

CD1.123	Typical Tree Pit in Raised Planter Over Basement A3 size	630_01(CD)003 P1 May 2022
CD1.124	Rain Garden Kerb Detail (Plan) A3 size	630_01(CD)004 P1 May 2022
CD1.125	Biodiverse Roof Typical Detail A3 size	630_01(CD)005 P1 May 2022
CD1.126	Chesterton Square paving detail (Plan) A3 size	630_01(CD)007 P1 27 May 2022
CD1.127	Chesterton garden paving with bench A3 size	630_01(CD)008 P1 27 May 2022
CD1.128	001 Chesterton Square (Long Section) A3 size	630_01(SC)001 P1 27 May 2022
CD1.129	002 Station Row - Causeway (Section and Elevation) A3 size	630_01(SC)002 P1 27 May 2022
CD1.130	003 Station Row- Swale Steps (Section and Plan) A3 size	630_01(SC)003 P1 27 May 2022
CD1.131	004 Station Row - Swale Banks and Bench (Section and Plan) A3 size	630_01(SC)004 P1 27 May 2022
CD1.132	006 1 Milton Avenue (Section AA and Section BB) A3 size	630_01(SC)006 P1 27 May 2022
CD1.133	007 Milton Avenue (Section AA) A3 size	630_01(SC)007 P1 27 May 2022
CD1.134	009 Cowley Road East (Section) A3 size	630_01(SC)009 P1 27 May 2022
CD1.135	010 Chesterton Gardens Pergola (Section) A3 size	630_01(SC)010 P1 10 June 2022
CD1.136	012 Chesterton Gardens Earth mounds and swales (Plan) A3 size	630_01(SC)012 P1 27 May 2022
CD1.137	Lab Servicing Access Swept Path Analysis A3 size	05425-C-2103-P6 8 October 2021

CD1.138	Milton Avenue Highway Improvement Southern Access Plan Rev P2 A3 size	05425-C-2110-P2 24 May 2022
CD1.139	Cowley Road - Cowley Circus Highway Improvement (Plan) A2 size	05425-C-2113-P2 9 December 2021
CD1.140a	Fire Tender Tracking Sheet 1 of 2 (Plan) A1 size	05425-C-2203-P1 20 April 2022
CD1.140b	Fire Tender Tracking Sheet 2 of 2 (Plan) A1 size	05425-C-2204-P1 20 April 2022
CD1.141	Lab Servicing Access Swept Path Analysis Refuse Vehicle A3 size	05425-C-2205-P1 27 April 2022
CD1.142	Rigid Truck Vehicle Tracking (Plan) A0 size	05425-C-2206-P1 28 April 2022
CD1.143	Refuse Vehicle Tracking (Plan) A0 size	05425-C-2207-P1 28 April 2022
CD1.144	S4 Basement Plan A0 size	1781-MAKE-S04-PA1999 27 May 2022
CD1.145	S4 Ground Floor Plan A0 size	1781-MAKE-S04-PA2000 27 May 2022
CD1.146	S4 Level 01 Plan A0 size	1781-MAKE-S04-PA2001 27 May 2022
CD1.147	S4 Levels 02-04 Typical Plan A0 size	1781-MAKE-S04-PA2002 27 May 2022
CD1.148	S4 Level 05 Plan A0 size	1781-MAKE-S04-PA2005 27 May 2022
CD1.149	S4 Level 06 Plan A0 size	1781-MAKE-S04-PA2006 27 May 2022

CD1.150	S4 Level 07 Plan - Plant A0 size	1781-MAKE-S04-PA2007 27 May 2022
CD1.151	S4 Roof Plan A0 size	1781-MAKE-S04-PA2008 27 May 2022
CD1.152	S4 Proposed East Elevation A0 size	1781-MAKE-S04-PA2200 27 May 2022
CD1.153	S4 Proposed South-East Elevation A0 size	1781-MAKE-S04-PA2201 27 May 2022
CD1.154	S4 Proposed South-West Elevation A0 size	1781-MAKE-S04-PA2202 27 May 2022
CD1.155	S4 Proposed North-West Elevation A0 size	1781-MAKE-S04-PA2203 27 May 2022
CD1.156	S4 Section AA and Section BB (Short and Long Section) A0 size	1781-MAKE-S04-PA2250 27 May 2022
CD1.157	S5 Location Plan A1 size	239-ACME-PLA-S05-0100 27 May 2022
CD1.158	S5 Ground Floor Plan A1 size	239-ACME-PLA-S05-1100 27 May 2022
CD1.159	S5 First Floor Plan A1 size	239-ACME-PLA-S05-1101 27 May 2022
CD1.160	S5 Second Floor Plan A1 size	239-ACME-PLA-S05-1102 27 May 2022
CD1.161	S5 Third Floor Plan A1 size	239-ACME-PLA-S05-1103

		27 May 2022
CD1.162	S5 Fourth Floor Plan A1 size	239-ACME-PLA-S05-1104 27 May 2022
CD1.163	S5 Roof Plan A1 size	239-ACME-PLA-S05-1105 27 May 2022
CD1.164	S5 Basement Plan A1 size	239-ACME-PLA-S05-1110 27 May 2022
CD1.165	S5 Mobility Hub Section A1 size	239-ACME-PLA-S05-1200 27 May 2022
CD1.166	S5 Western and Eastern Elevations A1 size	239-ACME-PLA-S05-1300 27 May 2022
CD1.167	S5 Northern and Southern Elevations A1 size	239-ACME-PLA-S05-1301 27 May 2022
CD1.168	S05 Mobility Hub Drawings Register	
CD1.169	S6 and S7 Combined Basement Plan A0 size	1818-MAKE-S06-PA1949 27 May 2022
CD1.170	S6 and S7 Combined Ground Floor Plan A0 size	1818-MAKE-S06-PA1950 27 May 2022
CD1.171	S6 Basement Plan A0 size	1818-MAKE-S06-PA1999 27 May 2022
CD1.172	S6 Ground Floor Plan A0 size	1818-MAKE-S06-PA2000 27 May 2022

CD1.173	S6 Levels 01-02 Typical Plan A0 size	1818-MAKE-S06-PA2001 27 May 2022
CD1.174	S6 Level 03 Plan A0 size	1818-MAKE-S06-PA2003 27 May 2022
CD1.175	S6 Level 04 Plan - Plant A0 size	1818-MAKE-S06-PA2004 27 May 2022
CD1.176	S6 Roof Plan A0 size	1818-MAKE-S06-PA2005 27 May 2022
CD1.177	S7 Basement Plan A0 size	1818-MAKE-S07-PA1999 27 May 2022
CD1.178	S7 Ground Floor Plan A0 size	1818-MAKE-S07-PA2000 27 May 2022
CD1.179	S7 Levels 01-02 Typical Plan A0 size	1818-MAKE-S07-PA2001 27 May 2022
CD1.180	S7 Level 03 Plan A0 size	1818-MAKE-S07-PA2003 27 May 2022
CD1.181	S7 Level 04 Plan - Plant A0 size	818-MAKE-S07-PA2004 27 May 2022
CD1.182	S7 Roof Plan A0 size	818-MAKE-S07-PA2005 27 May 2022
CD1.183	S6 and S7 Combined North-West Elevation A0 size	1818-MAKE-S06-PA2150 27 May 2022
CD1.184	S6 and S7 Combined South-East Elevation A0 size	1818-MAKE-S06-PA2151

		27 May 2022
CD1.185	S6 Proposed North-West Elevation A0	1818-MAKE-S06-PA2200 27 May 2022
CD1.186	S6 Proposed North-East Elevation A0 size	1818-MAKE-S06-PA2201 27 May 2022
CD1.187	S6 Proposed South-East Elevation A0 size	1818-MAKE-S06-PA2202 27 May 2022
CD1.188	S6 Proposed South-West Elevation A0 size	1818-MAKE-S06-PA2203 27 May 2022
CD1.189	S6 and S7 Combined Section AA (Long Section) A0 size	1818-MAKE-S06-PA2240 27 May 2022
CD1.190	S6 Section BB and Section AA (Short and Long Section) A0 size	1818-MAKE-S06-PA2250 27 May 2022
CD1.191	S7 Proposed North-West Elevation A0 size	1818-MAKE-S07-PA2200 27 May 2022
CD1.192	S7 Proposed North-East Elevation A0 size	1818-MAKE-S07-PA2201 27 May 2022
CD1.193	S7 Proposed South-East Elevation A0 size	1818-MAKE-S07-PA2202 27 May 2022
CD1.194	S7 Proposed South-West Elevation A0 size	1818-MAKE-S07-PA2203 27 May 2022
CD1.195	S7 Section DD and Section AA (Short and Long Section) A0 size	1818-MAKE-S07-PA2250 27 May 2022

CD1.196	Illustrative Masterplan Roof A1 size	239-ACME-PLA-S00-0012 27 May 2022
CD1.197	Illustrative Masterplan Ground Floor A1 size	239-ACME-PLA-S00-0013 27 May 2022
CD1.198	Illustrative Masterplan Typical Floor A1 size	239-ACME-PLA-S00-0014 27 May 2022
CD1.199	Fire Safety Statement	June 2022
CD1.200	Framework Travel Plan	May 2022
CD1.201	Social Value Statement	June 2022
CD1.202	Sustainability Strategy Rev 04	June 2022
CD1.203	Chesterton Sidings Cambridge Plans Rev A	31 May 2022
CD1.204	Make Drawing List for Planning Issue S4, S6, S7	
2.	**Documents not submitted with the original application but are revisions**	
CD2.00	Updated Statement of Environmental Statement Conformity	October 2022
CD2.01	Highways Technical Note	October 2022
CD2.02	Highways Safety Audit Documents	October 2022
CD2.03	Response to the comments of Cam Cycle	15 September 2022
CD2.04	Response to the comments of the Access Officer	25 August 2022
CD2.05	Flood Risk Assessment (FRA) Addendum	13 October 2022
CD2.06	Water Resources Addendum (Rev 1)	21 September 2022
CD2.07a	Updated Biodiversity Net Gain (BNG) Assessment Part 1 of 3	11 October 2022
CD2.07b	Updated Biodiversity Net Gain (BNG) Assessment Part 2 of 3	11 October 2022

CD2.07c	Updated Biodiversity Net Gain (BNG) Assessment Part 3 of 3	11 October 2022
CD2.08	Ecology Survey Report Update 2022	25 October 2022
CD2.09a	Statement in response to the comments of the Minerals and Waste Authority Part 1 pages1-50	October 2022
CD2.09b	Statement in response to the comments of the Minerals and Waste Authority Part 1 pages 51-100	October 2022
CD2.09c	Statement in response to the comments of the Minerals and Waste Authority Part 1 pages 101-114	October 2022
CD2.09d	Statement in response to the comments of the Minerals and Waste Authority Part 2 pages 1-50	October 2022
CD2.09e	Statement in response to the comments of the Minerals and Waste Authority Part 2 pages 51-89	October 2022
CD2.10	Updated Low Emission Strategy	25 August 2022
CD2.11	Energy Strategy Addendum	20 September 2022
CD2.12	Addendum to Sustainability Strategy	23 August 2022
CD2.13	Response to comments from Waste Services	
CD2.14	Updated Preliminary Operational Waste Management Plan V2	October 2022
CD2.15a	Cambridge, Past, Present and Future Feedback Response October 2022 Part 1 of 2	
CD2.15b	Cambridge, Past, Present and Future Feedback Response October 2022 Part 2 of 2	
CD2.16	Response to the comments of Urban Design Officer	
CD2.17	Landscape and Open Space Updates	28 October 2022
CD2.18	Phase 2 Ecology Survey Calculation Results	22 December 2022
CD2.19	Letter on BNG Position	9 January 2023

CD2.20	Letter from Appellant to LPA dated 8.11.22 enclosing further information	November 2022
CD2.21	Parameter Plan Existing Site Conditions Application Plan Rev A A1 size	239-ACME-PLAS01-0101 Rev A 12 October 2022
CD2.22	Parameter Plan Building Layout and Application Type Plan Rev A A1	239-ACME-PLAS01-0102 Rev A 12 October 2022
CD2.23	Parameter Plan Maximum Building Envelope Basement Plan Rev A A1 size	239-ACME-PLAS01-0103 Rev A 12 October 2022
CD2.24	Parameter Plan Maximum Building Envelope Ground Floor Plan Rev A A1 size	239-ACME-PLAS01-0104 Rev A 12 October 2022
CD2.25	Parameter Plan Maximum Building Envelope Typical Level Plan Rev A A1 size	239-ACME-PLAS01-0105 Rev A 12 October 2022
CD2.26	Parameter Plan Building Heights Plan Rev A A1 size	239-ACME-PLAS01-0106 Rev A 12 October 2022
CD2.27	Parameter Plan Proposed Uses Ground Floor Plan 07 Rev A A1 Size	239-ACME-PLAS01-0107 Rev A 12 October 2022
CD2.28	Parameter Plan Access Plan 08 Rev A A1 size	239-ACME-PLAS01-0108 Rev A 12 October 2022
CD2.29	Parameter Plan Landscape and Open Spaces Plan 09 Rev A A1 size	239-ACME-PLAS01-0109 Rev A 12 October 2022
CD2.30	Masterplan S00 Drawings register Rev B	27 October 2022

	(ACME)	
CD2.31a	Landscape Masterplan Rev P3 A3 size	630_01(MP)001 P3 27 October 2022
CD2.31b	Landscape Masterplan Rev P5 A3 size	630_01(MP)001 P5 24 April 2023
CD2.32a	Ecology Strategy Ground Floor Plan Rev P2 A3 size	630_01(MP)002 P2 11 October 2022
CD2.32b	Ecology Strategy Ground Floor Plan Rev P3 A3 size	630_01(MP)002 P3 24 April 2023
CD2.33a	Public Open Spaces Provision Plan Rev P2 A3 size	630_01(MP)004 P2 11 October 2022
CD2.33b	Public Open Spaces Provision Plan Rev P3 A3 size	630_01(MP)004 P30 24 April 2023
CD2.34	Hard Landscape Strategy (West) Rev P2 A3 size	630_01(MP)005 P2 11 October 2022
CD2.35	Hard Landscape Strategy (East) Rev P2 A3 size	630_01(MP)006 P2 11 October 2022
CD2.36	Hard Landscape Strategy (Wild Park) Rev P2 A3 size	630_01(MP)007 P2 11 October 2022
CD2.37	Tree Strategy Plan Rev P2 A3 size	630_01(MP)008 P2

		7 October 2022
CD2.38a	Attenuation Strategy Plan Rev P2 A3 size	630_01(MP)014 P2 7 October 2022
CD2.38b	Attenuation Strategy Plan Rev P3 A3 size	630_01(MP)014 P3 27 April 2023
CD2.39a	Tree Root Cell Extents Plan Rev P2 A3 size	630_01(MP)020 P2 11 October 2022
CD2.39b	Tree Root Cell Extents Plan Rev P3 A3 size	630_01(MP)020 P3 27 April 2023
CD2.40	Wild Park and Aggregates Yard Interface Plan Rev P2 A3 size	630_01(MP)021 P2 7 October 2022
CD2.41	Cycle Strategy (West) Rev P1 A3 size	630_01(MP)022 P1 7 October 2022
CD2.42	Cycle Strategy (East) Rev P1 A3 size	630_01(MP)023 P1 7 October 2022
CD2.43	Proximity to Mineral Safeguarded Areas Plan Rev P1 A3 size	630_01(MP)024 P1 7 October 2022
CD2.44a	Chesterton Way Plan 1 of 3 Rev P2 A3 size	630_01(MP)103 P2 7 October 2022
CD2.44b	Chesterton Way Plan 2 of 3 Rev P2 A3 size	630_01(MP)104 P2 7 October 2022
CD2.44c	Chesterton Way Plan 3 of 3 Rev P2 A3 size	630_01(MP)105 P2 7 October 2022
CD2.45	Cowley Road North Plan Rev P2 A3 size	630_01(MP)106 P2 7 October 2022
CD2.46	Cowley Road East Plan Rev P2 A3 size	630_01(MP)107 P2 7 October 2022

CD2.47	Bramblefields Way Plan Rev P2 A3 size	630_01(MP)109 P2 7 October 2022
CD2.48	1 Milton Avenue and Milton Walk Plan Rev P2 A3 size	630_01(MP)201 P2 11 October 2022
CD2.49	Chesterton Square Plan Rev P2 A3 size	630_01(MP)202 P2 7 October 2022
CD2.50	Station Row Plan Rev P2 A3 size	630_01(MP)203 P2 11 October 2022
CD2.51	Piazza Plan Rev P2 A3 size	630_01(MP)205 P2 7 October 2022
CD2.52a	Wild Park Plan Rev P2 A3 size	630_01(MP)209 P2 10 October 2022
CD2.52b	Wild Park Plan Rev P3 A3 size	630_01(MP)209 P3 24 April 2023
CD2.53	Typical Meanwhile Use Pocket Park Plan Rev P2 A3 size	630_01(MP)210 P2 12 October 2022
CD2.54	Chesterton Square Section Plan Rev P2 A3 size	630_01(SC)001 P2 11 October 2022
CD2.55	1 Milton Avenue Section AA and BB Plan Rev P2 A3 size	630_01(SC)006 P2 13 October 2022
CD2.56	Cowley Road East Section Plan Rev P2 A3 size	630_01(SC)009 P2 11 October 2022
CD2.57	Tree Survey Drawing	22_02771_OUT
CD2.58	Lab Servicing Access Swept Path Analysis Rev P7 A3 size	05425-C-2103-P7 11 October 2022
CD2.59	Milton Avenue Highway Improvement Southern Access Plan Rev P4 A3 size	05425-C-2110-P4 28 October 2022
CD2.60	Cowley Road - Cowley	05425-C-2113-P3

	Circus Highway Improvement (Plan) A2 size	9 December 2021
CD2.61a	Cowley Road Cowley Circus Highway Improvements Plan Rev P4 A2 size	05425-C-2113-P4 30 November 2022
CD2.61b	Cowley Road Cowley Circus Highway Improvements Plan Rev P7 A2 size	05425-C-2113-P7 17 April 2023
CD2.62a	Fire Tender Tracking Sheet 1 of 2 Rev P2 A1 size	05425-C-2203-P2 11 October 2022
CD2.62b	Fire Tender Tracking Sheet 2 of 2 Rev P2 A1 size	05425-C-2204-P2 11 October 2022
CD2.63	Rigid Truck Vehicle Tracking Plan Rev P2 A0 size	05425-C-2206-P2 11 October 2022
CD2.64	Refuse Vehicle Tracking Plan (Whole Site) Rev P0 A1 size	05425-C-2208-P0 7 October 2022
CD2.65	S4 Basement Plan Rev 01 A0 size	1781-MAKE-S04-PA1999 Rev 01 21 September 2022
CD2.66	S4 Ground Floor Plan Rev 01 A0 size	1781-MAKE-S04-PA2000 Rev 01 7 October 2022
CD2.67	S4 Level 01 Plan Rev 01 A0 size	1781-MAKE-S04-PA2001 Rev 01 7 October 2022
CD2.68	S4 Levels 02-04 Typical Plan Rev 01 A0 size	1781-MAKE-S04-PA2002 Rev 01 7 October 2022
CD2.69	S4 Level 05 Plan Rev 01 A0 size	1781-MAKE-S04-PA2005 Rev 01 7 October 2022
CD2.70	S4 Level 06 Plan Rev 01 A0 size	1781-MAKE-S04-PA2006 Rev 01

		7 October 2022
CD2.71	S4 Level 07 Plan (Plant) Rev 01 A0 size	1781-MAKE-S04-PA2007 Rev 01 7 October 2022
CD2.72	S4 Roof Plan Rev 01 A0 size	1781-MAKE-S04-PA2008 Rev 01 7 October 2022
CD2.73	S4 Section AA and Section BB (Short and Long Section) Plan Rev 01 A0 size	1781-MAKE-S04-PA2250 Rev 01 7 October 2022
CD2.74	S6 and S7 Combined Basement Plan Rev 01 A0 size	1818-MAKE-S06-PA1949 Rev 01 21 September 2021
CD2.75	S6 and S7 Combined Ground Floor Plan Rev 02 A0 size	1818-MAKE-S06-PA1950 Rev 02 21 September 2021
CD2.76	S6 Basement Plan Rev 01 A0 size	1818-MAKE-S06-PA1999 Rev 01 21 September 2021
CD2.77	S6 Ground Floor Plan Rev 02 A0 size	1818-MAKE-S06-PA2000 Rev 02 21 September 2021
CD2.78	S7 Basement Plan Rev 01 A0 size	1818-MAKE-S07-PA1999 Rev 01 21 September 2021
CD2.79	S7 Ground Floor Plan Rev 02 A0 size	1818-MAKE-S07-PA2000 Rev 02 21 September 2022
CD2.80	S6 Proposed North- West Elevation Rev 01 A0 size	1818-MAKE-S06-PA2200 Rev 01 21 September 2022

CD2.81	S6 Proposed South- East Elevation Rev 01 A0 size	1818-MAKE-S06-PA2202 Rev 01 21 September 2022
CD2.82	S7 Proposed North- West Elevation Rev 01 A0 size	1818-MAKE-S07-PA2200 Rev 01 21 September 2022
CD2.83	S7 Proposed North-East Elevation Rev 01 A0 size	1818-MAKE-S07-PA2201 Rev 01 21 September 2022
CD2.84	S7 Proposed South- East Elevation Rev 01 A0 size	1818-MAKE-S07-PA2202 Rev 01 21 September 2022
CD2.85	S6 and S7 Combined North-West Elevation Rev 01 A0 size	1818-MAKEPA2150 Rev 01 21 September 2022
CD2.86	S6 and S7 Combined South-East Elevation Rev 01 A0 size	1818-MAKEPA2151 Rev 01 21 September 2022
CD2.87	Illustrative Masterplan Roof Rev B A1 size	239-ACME-PLAS00-0012 Rev B 22 September 2022
CD2.88	Illustrative Masterplan Ground Floor Rev B A1 size	239-ACME-PLAS00-0013 Rev B 22 September 2022
CD2.89	Illustrative Masterplan Typical Floor Rev B A1 size	239-ACME-PLAS00-0014 Rev B 22 September 2022
CD2.90	Strategic Masterplan (Illustrative Only)	239-ACME-PLAS00-0020 12 May 2022

CD2.91	Strategic Masterplan Emerging NEC AAP (Illustrative Only) A1 size	239-ACME-PLAS00-0021 12 May 2022
3	**Key comments, representations, minutes, and correspondence as submitted by the Authority to the appeal questionnaire**	
CD3.00	Cambridge Fire and Rescue Services	14 November 2022
CD3.01	SCDC Tree Officer	10 November 2022
CD3.02a	Natural England	28 October 2022
CD3.02b	Natural England	24 November 2022
CD3.03a	Environment Agency	27 June 2022
CD3.03b	Environment Agency	7 November 2022
CD3.03c	Environment Agency	27 February 2023
CD3.04	Cadent Gas	27 June 2022
CD3.05a	Anglian Water	5 July 2022
CD3.05b	Anglian Water	10 November 2022
CD3.06a	Sport England	7 July 2022
CD3.06b	Sport England	26 September 2022
CD3.06c	Sport England	10 November 2022
CD3.07a	County Archaeology	8 July 2022
CD3.07b	County Archaeology	9 November 2022
CD3.08a	Local Highways Authority	12 July 2022
CD3.08b	Local Highways Authority	1 August 2022
CD3.08c	Local Highways Authority	8 December 2022
CD3.09a	Cambridgeshire County Council – Transport	7 September 2022
CD3.09b	Cambridgeshire County Council – Transport	22 February 2023
CD3.10a	National Highways	16 September 2022
CD3.10b	National Highways	28 October 2022
CD3.10c	National Highways	9 December 2022
CD3.10d	National Highways	6 January 2023

CD3.11a	Milton Parish Council	6 July 2022
CD3.11b	Milton Parish Council	23 November 2022
CD3.12	Cambridge Airport	20 July 2022
CD3.13a	Designing Out Crime Officer	26 July 2022
CD3.13b	Designing Out Crime Officer	10 November 2022
CD3.14a	Ecology Officer	2 August 2022
CD3.14b	Ecology Officer	7 December 2022
CD3.14c	Ecology Officer	19 April 2023
CD3.15a	City Council Environmental Health Officer	26 July 2022
CD3.15b	City Council Environmental Health Officer	21 November 2022
CD3.16a	SCDC Climate, Environment and Waste	26 July 2022
CD3.16b	SCDC Climate, Environment and Waste (Air Quality)	26 July 2022
CD3.16c	SCDC Climate, Environment and Waste	8 December 2022
CD3.17a	Sustainability Officer	3 August 2022
CD3.17b	Sustainability Officer	8 December 2022
CD3.18a	Minerals and Waste Planning Authority	28 July 2022
CD3.18b	Minerals and Waste Planning Authority	14 December 2022
CD3.18c	Email correspondence with Minerals and Waste Officer	April 2023
CD3.19	Conservation Officer	October 2022
CD3.20	Historic England	5 September 2022
CD3.21a	Cambridgeshire County Council - LLFA	15 August 2022
CD3.21b	Cambridgeshire County Council - LLFA	22 February 2023
CD3.21c	Cambridgeshire County Council - LLFA	22 April 2023
CD3.22	Network Rail	18 August 2022
CD3.23a	Urban Design Officer	12 October 2022
CD3.23b	Urban Design Officer	28 November 2022
CD3.24	SCDC Sustainable Communities and Wellbeing Team	31 August 2022

CD3.25a	Access Officer	25 August 2022
CD3.26	County Council Infrastructure Contributions	16 September 2022
CD3.27a	Health Officer	31 August 2022
CD3.27b	Health Officer HIA	31 August 2022
CD3.28	NHS Cambridgeshire and Peterborough CCG	7 September 2022
CD3.29a	East of England Ambulance Service	23 September 2022
CD3.29a	East of England Ambulance Service	25 November 2022
CD3.30a	Greater Cambridge Waste Services	27 September 2022
CD3.30b	Greater Cambridge Waste Services	24 February 2023
CD3.31a	Landscape Officer	27 September 2022
CD3.31b	Landscape Officer	15 December 2022
CD3.32a	Strategic Housing Officer	17 August 2022
CD3.32b	Strategic Housing Officer	24 August 2022
CD3.32c	Strategic Housing Officer	7 December 2022
CD3.33a	Sustainable Drainage Engineer	27 September 2022
CD3.33b	Sustainable Drainage Engineer	3 March 2023
CD3.34	Contaminated Land	13 July 2022
CD3.35	Fen Ditton Parish Council	11 October 2022
CD3.36	Ministry of Defence	27 January 2023
4.	**Committee Report and Minutes**	
CD4.00	Committee Report and Appendices	22 March 2023
CD4.01	Committee Minutes	22 March 2023
CD4.02	Committee Amendment Sheet	22 March 2023
5.	**Development Plan and Policy**	
CD5.00	South Cambridgeshire Local Plan (2018)	
CD5.01	South Cambridgeshire Local Plan Policies Map (2018)	

CD5.02	Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 – (Policy 16: Consultation Areas)	
CD5.03	Sustainable Design and Construction SPD (2020)	
CD5.04	Biodiversity SPD (2022)	
CD5.05	Cambridgeshire Flood and Water SPD (2016)	
CD5.06	Greater Cambridge Housing Strategy 2019 - 2023	
CD5.07	Fen Ditton Conservation Area Appraisal (2006)	
CD5.08	Riverside and Stourbridge Common Conservation Area Appraisal (2012)	
CD5.09	Greater Cambridge Employment Land & Economic Development Evidence Study (2020)	November 2020
CD5.10	Greater Cambridge Employment and Housing Evidence Update (2023) – Iceni Report	
CD5.11	District Design Guide SPD (2010)	March 2010
CD5.12	Landscape in New Developments SPD (2010)	March 2010
CD5.13a	NEC Landscape Character and Visual Impact Appraisal (LCVIA)	July 2020
CD5.13b	NEC Landscape Character and Visual Impact Assessment Figures	
CD5.14	NEC Strategic Heritage Impact Assessment	September 2021
CD5.15	NEC Townscape Strategy	October 2021
CD5.16	Development Management guidance `Evidence required to support Planning Applications ahead of the North East Cambridge (NEC) Area Action Plan (AAP)	
CD5.17	National Design Guide	January 2021
CD5.18	Cambridge City Local Plan (Policy 60)	October 2018

CD5.19	NECAAP Transport Evidence Base	
CD5.20	NECAAP Transport Position Statement	
CD5.21	NECAAP Infrastructure Delivery Plan	
CD5.22	Greater Cambridge Local Plan Transport Evidence Report – Preferred Options Update	October 2021
CD5.23	NECAAP High Level Transport Strategy	November 2021
CD5.24	The Setting of Heritage Assets 2nd Edition	December 2017
CD5.25	South Cambridgeshire District Council Cambridge Green Belt Study	September 2002
CD5.26	CCC Cambridge Landscape Character Assessment	April 2003
CD5.27	LDA Design Cambridge Inner Green Belt Boundary Study	November 2015
CD5.28a	Chris Blandford Associates Greater Cambridge Landscape Character Assessment Part A	February 2021
CD5.28b	Chris Blandford Associates Greater Cambridge Landscape Character Assessment Part B	February 2021
CD5.29	Chris Blandford Associates NEC Heritage Impact Assessment	28 September 2021
CD5.30	NEC Townscape Assessment	September 2021
CD5.31	Open Space SPD	2009
6.	**Appeal Submission Documents (as received by the inspector)**	
CD6.00	Appeal Form	
CD6.01	Appeal Covering Letter	23 January 2023
CD6.02	Cover letter - Confirmation of Appeal Submission	27 January 2023
CD6.03	Appeal Site Location Plan	27 May 2022
CD6.04	Appellant's Statement of Case	20 January 2023
CD6.05	Draft Statement of Common Ground	23 January 2023

CD6.06	Statement of Common Ground Appellant and LPA	25 April 2023
CD6.07	Statement of Common Ground on Design between Appellant and LPA	25 April 2023
CD6.08	Statement of Common Ground on Landscape between Appellant and LPA	25 April 2023
CD6.09	Statement of Common Ground on Heritage between Appellant and LPA	25 April 2023
CD6.10	Statement of Common Ground between Appellant and CPPF	25 April 2023
CD6.11	Updated Statement of Common Ground Appellant and LPA	23 May 2023
CD6.12	Statement of Common Ground between Appellant and Water Resources EA	23 May 2023
CD6.13	Statement of Common Ground between Transport Appellant and County Council	23 May 2023
7.	**Case Law and Appeal Decisions**	
CD7.00	Appeal Decision Notice 20/03429/FUL (APP/Q0505/W/21/3282911) 104-112 Hills Road, CB2 1LQ	21 March 2022
CD7.01	Rebuttal Proof of Evidence of Mr Stephen Connell	
CD7.02	Council of the City of Newcastle Upon Tyne v Secretary of State for Levelling Up, Housing and Communities (EWHC 2752) Judgement by Hon. Mr Justice Holgate	1 November 2022
CD7.03	Bramshill v SSHCLG and Hart District Council and Historic England and National Trust for Places of Historic Interest or Natural Beauty (EWHC 3437) Judgement by Lord Phillips and Lord Arnold	9 March 2021
8.	**Appellant's Documents**	
CD8.00	Appellant's Statement of Case	20 January 2023
CD8.01	2022 Milton Road Corridor Modelling Results Technical Note	March 2023

CD8.02	Ecology Technical Note	25 April 2023
CD8.03	Appellant Proof of Evidence – Masterplan Summary	9 May 2023
CD8.04a	Appellant Proof of Evidence – Masterplan Part 1 of 10	9 May 2023
CD8.04b	Appellant Proof of Evidence – Masterplan Part 2 of 10	9 May 2023
CD8.04c	Appellant Proof of Evidence – Masterplan Part 3 of 10	9 May 2023
CD8.04d	Appellant Proof of Evidence – Masterplan Part 4 of 10	9 May 2023
CD8.04e	Appellant Proof of Evidence – Masterplan Part 5 of 10	9 May 2023
CD8.04f	Appellant Proof of Evidence – Masterplan Part 6 of 10	9 May 2023
CD8.04g	Appellant Proof of Evidence – Masterplan Part 7 of 10	9 May 2023
CD8.04h	Appellant Proof of Evidence – Masterplan Part 8 of 10	9 May 2023
CD8.04i	Appellant Proof of Evidence – Masterplan Part 9 of 10	9 May 2023
CD8.04j	Appellant Proof of Evidence – Masterplan Part 10 of 10	9 May 2023
CD8.05	Appellant Proof of Evidence – Design Summary	9 May 2023
CD8.06	Appellant Proof of Evidence – Design	9 May 2023
CD8.07	Appellant Proof of Evidence – LVIA Summary	May 2023
CD8.08	Appellant Proof of Evidence – LVIA	May 2023
CD8.09a	Appellant Proof of Evidence – LVIA Appendices Part 1 of 4	
CD8.09b	Appellant Proof of Evidence – LVIA Appendices Part 2 of 4	
CD8.09c	Appellant Proof of Evidence – LVIA Appendices Part 3 of 4	

CD8.09d	Appellant Proof of Evidence – LVIA Appendices Part 4 of 4	
CD8.10	Appellant Proof of Evidence – Heritage Summary	May 2023
CD8.11	Appellant Proof of Evidence – Heritage	May 2023
CD8.12	Appellant Proof of Evidence – Heritage Appendices	
CD8.13	Appellant Proof of Evidence - Ecology	9 May 2023
CD8.14	Appellant Proof of Evidence – Ecology Appendix A Ecology Technical Note	5 May 2023
CD8.15	Appellant Proof of Evidence – Ecology Appendix 1 Ecology Survey Report Update	2022
CD8.16	Appellant Proof of Evidence – Ecology Appendix 2 Bat Hibernation Survey Report	2023
CD8.17	Appellant Proof of Evidence – Ecology Appendix 3 OMH Phasing Plan	
CD8.18	Appellant Proof of Evidence – Ecology Appendix 4 BNG Calculator updated	18 April 2023
CD8.19	Appellant Proof of Evidence – Ecology Appendix 5 Bat Emergence Survey Report Interim	2 May 2023
CD8.20	Appellant Proof of Evidence – Water Summary	
CD8.21	Appellant Proof of Evidence – Water	9 May 2023
CD8.22	Appellant Proof of Evidence – Water Appendix A Legislation and Regulation	9 May 2023
CD8.23	Appellant Proof of Evidence – Water Appendix B Consultation with Cambridge Water	
CD8.24a	Appellant Proof of Evidence – Water Appendix C Quantitative Assessment Part 1 of 2	
CD8.24b	Appellant Proof of Evidence – Water Appendix C Quantitative Assessment Part 2 of 2	

CD8.25	Appellant Proof of Evidence – Water Appendix D Cambridge Water Household and Non Household Data	
CD8.26	Appellant Proof of Evidence – Transport Summary	May 2023
CD8.27	Appellant Proof of Evidence – Transport	May 2023
CD8.28	Appellant Proof of Evidence – Transport Appendix A	
CD8.29	Appellant Proof of Evidence – Landscape Design Summary	9 May 2023
CD8.30	Appellant Proof of Evidence – Landscape Design	9 May 2023
CD8.31	Appellant Proof of Evidence – Landscape Design Appendix	
CD8.32	Appellant Proof of Evidence – Need Summary	May 2023
CD8.33	Appellant Proof of Evidence – Need	May 2023
CD8.34	Appellant Proof of Evidence – Need Appendix 1 Cambridge Office & Labs Databook	
CD8.35	Appellant Proof of Evidence – Planning Summary	May 2023
CD8.36	Appellant Proof of Evidence – Planning	May 2023
CD8.37	Appellant Proof of Evidence – Planning Appendices	
CD8.38a	Appellant Rebuttal Proof of Evidence – Landscape Part 1 of 2	May 2023
CD8.38b	Appellant Rebuttal Proof of Evidence – Landscape Part 2 of 2	May 2023
CD8.39	Appellant Rebuttal Proof of Evidence – Need	May 2023
CD8.40	Appellant Rebuttal Proof of Evidence – Planning, Design and Landscape	May 2023
CD8.41	Appellant Rebuttal Proof of Evidence – Planning, Design and Landscape Appendices	
9.	**Council's Appeal Documents (SCDC)**	

CD9.00	LPA Statement of Case	24 March 2023
CD9.01	Land Adjacent To Cambridge North Station Milton Avenue front elevation	
CD9.02	Greater Cambridge Employment and Housing Evidence Update (2023) – Iceni Report	
CD9.03	One Cambridge Square Design and Access Statement	30 June 2017
CD9.04	SCDC Proof of Evidence – Design	May 2023
CD9.05	SCDC Proof of Evidence – Heritage	May 2023
CD9.06	SCDC Proof of Evidence – Heritage Appendices	
CD9.07	SCDC Proof of Evidence – Planning	May 2023
CD9.08	SCDC Proof of Evidence – Need with Appendices	
CD9.09	SCDC Proof of Evidence – Landscape	May 2023
CD9.10	SCDC Proof of Evidence – Landscape Appendices	
CD9.11	SCDC Rebuttal Proof of Evidence – Design	23 May 2023
CD9.12	LPA Water Resources Position Statement	23 May 2023
10.	**County Council Documents**	
CD10.00	Cambridgeshire County Council – Transport Statement of Case	31 March 2023
11.	**Rule 6 Party Documents**	
CD11.00	CPPF Statement of Case	29 March 2023
CD11.01	CPPF Proof of Evidence Summary	
CD11.02	CPPF Proof of Evidence	
CD11.03	CPPF Proof of Evidence Appendix A Photographs	
12.	**Other Evidence Documents**	
CD12.00	S2372FL JDCC Committee Report - 1 Cambridge Square	21 March 2018

CD12.01	S237217FL JDCC Committee Report – Hotel	4 July 2017
CD12.02	Draft Water Resources Management Plan 2024	24 February 2023
CD12.03	Savills Build to Rent Market in Greater Cambridge and West Suffolk	5 June 2020
CD12.04	Arc4in Build to Rent Market Strategic Overview and Summary of Site-Specific Appraisals	March 2021
CD12.05	Baits Bite Lock Conservation Area Draft Policy	2006
CD12.06	080266OUT Committee Report – CB1	15 October 2008
CD12.07	Landscape Institute/IEMA: "Guidelines on Landscape and Visual Impact Assessment", 3rd Edition	2013
CD12.08	Landscape Institute Technical Guidance Note "Assessing Landscape value Outside of landscape Designations"	February 2021
CD12.09	National Character Area 88, Bedfordshire and Cambridgeshire Claylands	
CD12.10	Cycle Infrastructure Design LTN 120	July 2020
13.	**Third Party Documents**	
CD13.00	Environment Agency Final Statement	23 May 2023
CD13.01	EA Appendix 1: Baseline data of risk of deterioration to water bodies from water abstraction	
CD13.02	EA Appendix 1A: Anglian Hydroecology Technical Report	
CD13.03	EA Appendix 2: GCP Draft Briefing Note	
CD13.04	EA Appendix 3: EA Representation CWC dWRMP24	27 March 2023
CD13.05	EA Appendix 3: Cambridge Water WRMP24 Evidence Report	
CD13.06	EA Appendix 4: EA Representation CWC dWRMP24 V2	17 May 2023

CD13.07	EA Appendix 4: Cambridge Water WRMP24 Evidence Report V2	
CD13.08	EA Appendix 5: Email to GCP	6 January 2023
14.	**Interested Party Representations**	
CD14.00	Cadent Gas Overview Map of Worksite	16 February 2023
CD14.01a	Mr S Clarke Representation Form	22 March 2023
CD14.01b	Mr S Clarke Attachment - County Council Education Library Waste Appeal Statement	
CD14.02a	Environment Agency Advice Statement on Water Resources	27 February 2023
CD14.02b	Environment Agency Position Letter	24 March 2023
CD14.03a	U + I plc and Town Position Letter	14 September 2022
CD14.03b	U + I plc and Town Position Letter	22 March 2023
CD14.04	Ministry of Defence Position Letter	3 March 2023
CD14.05	Natural England Position Email Confirmation	23 March 2023
CD14.06a	Mr J Tuttle Representation Form	23 March 2023
CD14.06b	Mr J Tuttle Attachment – CCC Transport Statement	
CD14.07	Mr D Williams Representation Form	20 March 2023
15.	**Inquiry Documents**	
CD15.00	S106 Introductory Note	
CD15.01	Cambridge North S106 Heads of Terms V16	23 May 2023
CD15.02	CIL Compliance Statement	23 May 2023
CD15.03	Draft Section 106	
CD15.04	Draft Conditions Schedule	

Annex D

SUGGESTED CONDITIONS

Conditions applicable to the Full Permission and Outline Permission

Phasing

Site Wide Phasing Plan

1. Prior to the commencement of any development, with the exception of below ground works, a Site Wide Phasing Plan shall be submitted to and approved in writing by the local planning authority. The Site Wide Phasing Plan shall include a mechanism for its review and amendment. The development shall be carried out in accordance with such approved details. References within this permission to a "phase" shall be to a phase as identified in the approved phasing plan.

Demolition Construction Environmental Management Plan (DCEMP)

2. Prior to the commencement of any development on any phase, a Demolition and Construction Environmental Management Plan (DCEMP) shall be submitted to and approved in writing by the local planning authority for that phase.

The DCEMP for a phase shall include the following in respect of that phase:

a) Proposed earthworks including method statement for the stripping of topsoil for reuse, the raising of land levels (if required) and arrangements for the temporary topsoil storage to BS3882:2007.

b) Archaeological protection and mitigation measures to be implemented during the construction process.

c) A traffic management plan including:

- contractor's access arrangements for vehicles, plant and personnel including the location of construction traffic routes to and from the phase, details of their signing, monitoring and enforcement measures designed to require compliance with the approved routing arrangements;
- contractor parking including details and quantum of the proposed car parking and methods of preventing on street car parking; movements and control of muck away lorries;
- movements and control of all deliveries; and control of dust, mud and debris, in relationship to the operation of the adopted public highway.

d) Details of haul routes within the phase.

e) A plan specifying the area and siting of land to be provided for parking, turning, loading and unloading of all vehicles visiting the relevant parts of the site and siting of the contractor's compound during the construction period to be agreed on a phased basis.

f) Collection and Delivery times for construction purposes. (Standard delivery and collection times during construction and demolition are between 0800 hours and

1800 hours on Monday − Friday and between 0800 hours and 1300 hours on Saturday and no collections or deliveries on Sundays or Bank and public holidays).

g) Dust management and wheel washing or other suitable mitigation measures such as lorry sheeting, including the consideration of construction / engineering related emissions to air, to include dust and particulate monitoring and review and the use of low emissions vehicles and plant / equipment

h) Noise and vibration (including piling) impact / prediction assessment, monitoring and recording protocols / statements and consideration of mitigation measures in accordance with the provisions of BS5228 (2009): Code of practice for noise and vibration control on construction and open sites − Part 1 and 2 (or as superseded).

i) Details of best practice measures to be applied to prevent contamination of the water environment during construction.

j) Measures for soil handling.

k) Details of concrete crusher if required to be used on that phase.

l) Details of odour control systems used during construction including maintenance and manufacture specifications.

m) Maximum noise levels and appropriate mitigation for construction machinery, equipment, plant and vehicles.

n) Site lighting during construction.

o) Screening and hoarding details.

p) Access and protection arrangements around the site for pedestrians, cyclists and other road users.

q) Procedures for interference with public highways.

r) External safety and information signing notices.

s) Liaison, consultation and publicity arrangements, including dedicated points of contact.

t) Complaints procedures, including complaints response procedures

u) Membership of the considerate contractors' scheme.

v) The provision of safe walking and cycling routes through the construction site including the management of existing Public Rights of Way, as well as routes serving completed phases of the development.

w) A Construction Travel Plan setting out measures to encourage construction site operatives and construction site visitors to travel to and from the phase using sustainable means of transport.

x) Piling method statement detailing mitigation measures, where piling is proposed.

Development of each phase shall be carried out in accordance with the approved DCEMP for that phase.

Biodiversity

Construction Ecological Management Plan

3. Prior to the commencement of each phase of development, (including demolition, ground works, vegetation clearance) a Construction Ecological Management Plan (CEcMP) for that phase shall be submitted to and approved in writing by the local planning authority. The CEcMP for each phase shall include the following in respect of that phase:

a) Risk assessment of potentially damaging construction activities.

b) Identification of "biodiversity protection zones".

c) Practical measures to avoid or reduce impacts during construction (both physical measures and sensitive working practices) in the form of method statements.

d) The location and timings of sensitive works to avoid harm to biodiversity features.

e) The times during construction when specialist ecologists need to be present on site to oversee works.

f) Responsible persons and lines of communication.

g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

h) Use of protective fences, exclusion barriers and warning signs if applicable.

The approved CEcMP for a phase shall be adhered to and implemented throughout the construction period of that phase strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Ecological Design Strategy

4. Prior to the commencement of each phase of development, with the exception of below ground works, an Ecological Design Strategy (EDS) for that phase addressing habitat creation, ecological enhancement, mitigation and compensation where appropriate, which shall be in accordance with the Greater Cambridge SuDS Supplementary Planning Document (2022) shall be submitted and approved in writing by the local planning authority.

The EDS shall include the following in connection with a phase:

a) The purpose and conservation objectives for the proposed works.

b) Review of site potential and constraints.

c) Detailed design(s) and/or working method(s) to achieve the stated objectives.

d) The extent and location/area of all proposed works on appropriate scale maps and plans.

e) Type and source of materials to be used where appropriate, e.g. native species of local provenance.

f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.

g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

h) Details of initial aftercare and long-term maintenance.

i) Details of monitoring and remedial measures.

j) Details for disposal of any wastes arising from the works.

The EDS for a phase shall be implemented in accordance with the approved details on that phase and thereafter all features shall be retained in that manner for the lifetime of the development.

Lighting Scheme

5. Prior to the commencement of each phase of development above ground, a lighting scheme for that phase shall be submitted to and approved in writing by the local planning authority. The scheme shall:

a) Include details of any external lighting within that phase such as street lighting, floodlighting, security lighting and an assessment of impact on any sensitive residential premises off site. The scheme for a phase shall include layout plans / elevations with luminaire locations annotated, full isolux contour map / diagrams showing the predicted illuminance in the horizontal and vertical plane (in lux) at critical locations within that phase, on the boundary of the that phase and at adjacent properties, hours and frequency of use, a schedule of equipment in the lighting design (luminaire type / profiles, mounting height, aiming angles / orientation, angle of glare, operational controls) and shall assess artificial light impact in accordance with the Institute of Lighting Professionals "Guidance Notes for the Reduction of Obtrusive Light GN01:2011".

b) Identify those areas/features on that phase that are particularly sensitive for bats and which are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, e.g. for foraging; and

c) Show how and where any external lighting will be installed which clearly demonstrates that areas to be lit will not disturb or prevent bats from using their territory or having access to their breeding sites and resting places.

No external lighting within a phase shall be installed other than in accordance with the specifications and locations set out in the approved scheme for that phase, and shall be maintained thereafter in accordance with the scheme for the lifetime of the development.

Green Roofs

6. No above ground level development shall commence on any building until details of any biodiverse (green, blue or brown) roof(s) for that building have been submitted to and approved in writing by the local planning authority. Details of the green biodiverse roof(s) shall include means of access for maintenance purposes. Plans and sections showing the make-up of the sub-base to be used shall include the following:

a) Roofs will be biodiverse based with extensive substrate varying in depth from between 80-150mm.

b) Planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (the seed mix shall be focused on wildflower planting indigenous to the locality and shall contain no more than a maximum of 25% sedum (green roofs only)).

c) The biodiverse (green) roof shall not be used as an amenity facility nor sitting out space of any kind whatsoever and shall only be used otherwise as a biodiverse green roof in the case of essential maintenance or repair, or escape in case of emergency.

d) Where solar panels are proposed, bio-solar roofs shall be incorporated under and in between the panels. An array layout will be required incorporating a minimum of 0.75m between rows of panels for access and to ensure establishment of vegetation.

e) A management/maintenance plan.

All works to biodiverse roofs on a building shall be carried out in accordance with the approved details for that building prior to first occupation of that building and shall thereafter be maintained in accordance with the approved details for the lifetime of the development.

Contamination

Site Investigation

7. No development of any building or the Wild Park within a phase shall commence until:

a) The site for that building or the Wild Park has been subject to a detailed scheme for the investigation and recording of contamination and remediation objectives determined through a risk assessment and which has been agreed in writing by the local planning authority.

b) Detailed proposals for that building or the Wild Park for the removal, containment or otherwise rendering harmless of any contamination (the Remediation Method Statement) have been submitted to and approved in writing by the local planning authority.

Remediation

8. Prior to the first occupation of each building or the first use of the Wild Park within any phase of development, the works specified in any Remediation Method Statement detailed in Condition 7 for that building or the Wild Park must be completed and a verification report submitted to and approved in writing by the local planning authority.

Unidentified Contamination

9. If, during remediation or construction works, any additional or unexpected contamination (AUC) is identified, then: (1) works in the relevant phase shall cease until (2) remediation proposals for the AUC have been agreed in writing by the Local Planning Authority before any further works on the phase proceed and where such

works relate to the construction of a building the remediation proposals shall be fully implemented prior to first occupation of that building hereby approved.

Transport

Future Management and Maintenance of Streets

10. Prior to the commencement of each phase of development, with the exception of below ground works, details of the proposed arrangements for future management and maintenance of the proposed streets under the control of the Applicant within that phase shall be submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details. Where streets are to be adopted, they shall be maintained in accordance with the approved management and maintenance details until such time as such streets are adopted.

Car and Cycle Parking

11. Prior to first occupation of any building within a phase, with the exception of below ground works, a Car and Cycle Parking Management Plan (CCPMP) for that phase shall be submitted to and approved in writing by, the local planning authority. The approved CCPMP for a phase shall include, but not necessarily be limited to, the following details:

a) how the car and cycle parking spaces will be allocated for each building including, where relevant, on-street parking;
b) confirmation that car and cycle parking provision for each building will be made available to occupants and maintained in operational condition for the lifetime of the development;
c) when the surface level car and cycle parking will be made available for use;
d) how the safety of users and access to the car and cycle parking areas within each building will be controlled and managed, including after hours use; and
e) the location and appearance of proposed security measures such as gates/shutters across the vehicle entrance/exit.

The development of each phase shall be carried out in accordance with the CCPMP for that phase and retained thereafter.

Landscape

Hard and Soft Landscape

12. Notwithstanding the approved plans, prior to the commencement of development above ground level for each phase, other than demolition, details of a hard and soft landscaping scheme for that phase shall be submitted to and approved in writing by the local planning authority. These details shall include:

a) existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines indicating lines, manholes, supports);

b) planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate and an implementation/planting programme;

c) boundary treatments (including gaps for hedgehogs) indicating the type, positions, design, and materials of boundary treatments to be erected.

d) the planting and establishment of structural landscaping to be provided in advance of all or specified parts of the site as appropriate.

e) details of all tree pits, including those in planters, hard paving and soft landscaped areas. All proposed underground services will be coordinated with the proposed tree planting.

All hard and soft landscape works within each phase shall be carried out and maintained in accordance with the approved landscaping details and programme for delivery for that phase. If within a period of ten years from the date of the planting, or replacement planting, any tree or plant is removed, uprooted or destroyed or dies, another tree or plant of the same species and size as that originally planted shall be planted at the same place as soon as is reasonably practicable.

Irrigation and Maintenance Scheme

13. Where the approved plans identify that trees are to be planted on a building plot then such building shall not be occupied until an irrigation and maintenance scheme for those trees has been submitted to and approved in writing by the local planning authority. From occupation of such building the approved irrigation and maintenance scheme shall be implemented and thereafter retained.

Sustainability

BREEAM Interim Design Stage Certification

14. Within six months of commencement of each building (excluding the residential buildings), or as soon as practicable after commencement of that building, a BRE issued Design Stage Certificate shall be submitted to, and approved in writing by, the local planning authority demonstrating that BREEAM 'excellent' as a minimum will be met for that building, with five credits for Wat 01 (water consumption). Where the Design Stage certificate for a building shows a shortfall in credits for BREEAM 'Excellent' accreditation, a statement shall also be submitted identifying how the shortfall for that building will be addressed to secure 'Excellent' accreditation. In the event that such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

BREEAM Post Construction Certification

15. Prior to the first use or occupation of each building (excluding the residential buildings) hereby approved, or within six months of first occupation of that building, a BRE issued post Construction Certificate shall be submitted to, and approved in writing by the local planning authority, indicating that the approved BREEAM rating has been met for that building. In the event that such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

Emission Ratings

16. No gas fired combustion appliances for any building within each phase shall be installed until details demonstrating the use of low Nitrogen Oxide (NOx) combustion boilers, (i.e., individual gas fired boilers that meet a dry NOx emission rating of ≤40mg/kWh) for that building have been submitted to and approved in writing by the local planning authority.

If the proposals include any gas fired Combined Heat and Power (CHP) System, the details shall demonstrate that the system meets the following emissions standards for various engine types:

- Spark ignition engine: less than or equal to 150 mg NOx/Nm^3
- Compression ignition engine: less than 400 mg NOx/Nm^3
- Gas turbine: less than 50 mg NOx/Nm^3

The details shall include a manufacturers Nitrogen Oxides (NOx) emission test certificate or other written evidence to demonstrate that every appliance installed meets the emissions standards above.

The approved appliances for each building shall be fully installed and operational before that building is occupied or the use of that building is commenced and retained as such.

Design

Materials

17. Prior to commencement of each phase of development above ground level, except for demolition, details of all the materials for the external surfaces of buildings to be used in the construction of the development for that phase shall be submitted to and approved in writing by the local planning authority. Only materials specified in the approved details shall be used on that phase of development.

Sample Panels

18. Prior to commencement of each phase of development above ground, except for demolition, sample palettes shall be available to view on site of all the external materials to be used on site for buildings within that phase. Sample palettes shall include sample panels of all bricks proposed to be used on site, together with sheeting material to be used for metal cladding and other materials to be used for fenestration. The brick panels shall be representative of the choice of bond, coursing, special brick patterning, mortar mix and pointing techniques. All details shall be submitted to and approved in writing by the local planning authority. The approved sample panels for a phase are to be retained on site for the duration of the work on that phase for comparative purposes. Works on a phase will take place only in accordance with approved details for that phase.

Drainage

Surface Water Drainage Design

19. No development above ground level on a phase shall commence until a detailed design of the surface water drainage for that phase, including a management and

maintenance plan of surface water drainage within that phase, has been submitted to and approved in writing by the local planning authority. The design submitted shall distinguish between those parts of the system which are to be adopted by a statutory undertaker and those which are to remain under private ownership. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

The scheme shall be based upon the principles within the agreed:

• Flood Risk Assessment and Drainage Strategy, PJA Civil Engineering Ltd, Ref: 05425-R-03-C-FRA Rev C, Dated: 6 June 2022

• Technical Note, PJA Civil Engineering Ltd, Ref:05425 Version E, Dated: 17 April 2023

and shall also include:

a) Full results of the proposed drainage system modelling in the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;

b) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);

c) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections);

d) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupiers;

e) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems;

f) Full details of the maintenance/adoption of the surface water drainage system;

g) Permissions/consents to connect to a receiving watercourse or sewer;

h) CCTV survey and assessment of the downstream network to demonstrate sufficient capacity to receive additional volumes of surface water;

i) For the first Phase only, an investigation into downstream connectivity of the First Public Drain Overflow, via dye tracing, of the culverted section beneath the railway lines, adjoining the Site should be undertaken. A Summary Report, with accompanying photographs and plans, should be prepared and submitted to the local planning authority and shared with the Lead Local Flood Authority;

j) Measures taken to prevent pollution of the receiving groundwater and/or surface water.

The approved surface water drainage scheme for each phase of development shall be subsequently implemented in full accordance with the approved details prior to the first occupation of any part of the phase of development or in accordance with an implementation programme agreed in writing with the local planning authority and retained thereafter.

Surface Water Drainage (Construction Phase)

20. Prior to the commencement of each phase of development, details of measures indicating how additional surface water run-off from that phase will be avoided/mitigated during the construction works for that phase shall be submitted to and approved in writing by the local planning authority. The details for a phase shall include collection, balancing and/or settlement systems for these flows as required. The approved measures and systems for that phase or part thereof shall be brought into operation before any works to create buildings or hard surfaces commence on that phase or relevant part thereof.

System Survey & Report

21. Upon completion of the approved surface water drainage system for each phase, including any attenuation ponds, SuDs and swales, and prior to their adoption by a statutory undertaker or management company; a survey and report from an independent surveyor for that phase shall be submitted to and approved in writing by the local planning authority. The survey and report shall be carried out by an appropriately qualified Chartered Surveyor or Chartered Engineer and demonstrate that the surface water drainage system has been constructed in accordance with the approved details. Where any corrective/remedial works are necessary, details of those works with a timetable for their completion, shall be provided for approval in writing by the local planning authority. Any corrective/remedial works required for a phase shall be carried out in accordance with the approved details and timetable for that phase and subsequently re-surveyed by an appropriately qualified Chartered Surveyor or Chartered Engineer, with their findings submitted to and approved in writing by the local planning authority.

Foul Water

22. Prior to the commencement of each building within a phase of development above ground level a scheme for the provision and implementation of foul water drainage for that building shall be submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details prior to the first occupation of each building within a phase or in accordance with an implementation programme agreed in writing with the local planning authority.

Airport safety

Bird Hazard Management Plan

23. Prior to commencement of buildings within each phase of development above ground level, other than demolition, a Bird Hazard Management Plan for that phase shall be submitted to and approved in writing by the local planning authority. The submitted plan shall include details of the management of any flat/shallow

pitched/green roofs on buildings within that phase which may be attractive to nesting, roosting and loafing birds.

The Bird Hazard Management Plan for a phase shall be implemented as approved and shall be managed in accordance with the Plan for the life of the buildings within that phase.

Glint and glare

24. Prior to the installation of any PV panels on the roof of any building, a Glint and Glare Assessment for the PV panels on that building shall be submitted to and approved in writing by the local planning authority. No PV panels shall be installed on a building other than in accordance with the approved details for that building.

Environmental Amenity

Noise (plant/equipment)

25. Prior to the commencement of each phase of development above ground level, a noise assessment and a scheme for the insulation of the building(s) and/or associated plant / equipment or other attenuation measures for each building, designed to minimise and mitigate the level of noise emanating from the building(s) and/or plant/equipment shall be submitted to and approved in writing by the local planning authority for that phase. The scheme for each building as approved shall be fully implemented before the first occupation of that building and shall thereafter be maintained in strict accordance with the approved details for the life of the development.

Odour − details of extraction

26. Prior to the first occupation of any building within each phase of development which is to contain a commercial kitchen, a scheme detailing plant, equipment and machinery used for the purposes of extraction, filtration and abatement of cooking odours for that building shall be submitted to and approved in writing by the local planning authority. The approved scheme for a building shall be installed and fully implemented before the first occupation of that building and shall thereafter be maintained in strict accordance with the approved details.

Height Limitations on Buildings and Structures

27. No building or other structure, whether temporary or permanent shall be permitted to be erected on the site at any time which exceeds 51 metres Above Mean Sea Level (AMSL).

Compliance with Environmental Statement

28. The development shall be carried out in accordance with the mitigation measures set out in Table 20.1 of the Environmental Statement (dated June 2022) and the following Technical Notes:

a) Technical Note by PJA Civil Engineering Ltd (Ref:05425 Version E dated 17 April 2023)
b) Technical Note by Temple Group Ltd (Ref:T6118 dated 20 April 2023)

c) Technical Note ECO00253 CN Phase 2 by RPS Consulting Services Ltd (RPS) dated 5 May 2023

Implementation of the Low Emissions Strategy

29. The development hereby approved shall be carried out in accordance with the Cambridge North Low Emission Strategy, PJA, August 2022 Version B. Prior to first occupation or use of any building hereby approved, a detailed implementation plan shall be submitted to and approved in writing by the local planning authority for that building. The implementation plan for a building shall show the location of electric vehicle charge points (at least 25% of the new car parking spaces to have electric charging points with passive provision for the remainder), capacity, charge rate, details of model, location of cabling and electric infrastructure drawings to include passive charge point provision for all remaining spaces connected to that building. The electric vehicle charge points for each building shall be installed within that building prior to first use of that buildings in accordance with the approved implementation plan and retained thereafter.

Hours of Works

30. No construction or demolition work shall be carried out and no plant or power operated machinery shall be operated in connection with the construction of the development other than between the following hours: 0800 hours and 1800 hours on Monday to Friday, 0800 hours and 1300 hours on Saturday and at no time on Sundays, Bank or Public Holidays.

Commercial Deliveries

31. Collection from and deliveries to any non-residential premises including those with retail, food or commercial uses shall only take place between the hours of 07.00 to 23.00 Monday to Saturday and 0900 to 1700 on Sunday, Bank and other Public Holidays.

Conditions applicable to that part of the application that was submitted in full with full details

Time Limit

32. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Approved Plans

33. The development hereby permitted shall be carried out in accordance with the approved documents, as listed at Schedule 1 of this decision, save for where such details are superseded by further details being submitted to and approved by the local planning authority pursuant to the conditions attached to this permission.

Change of Use Class E

34. Notwithstanding the provisions of Article 3 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that order with or without modification), the buildings S4, S6 and S7 shall only be used for office (Use Class E(g)(i)) and research and development (Use Class E(g)(ii)) uses above ground floor level and for no other use without the granting of a specific planning permission.

Change of Use Class E & F

35. Notwithstanding the provisions of Article 3 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that order with or without modification), the ground floor use of buildings S4, S5, S6 and S7 (other than those connected with the operation of the mobility hub) shall only be used for Class E (excluding Class E (g) (iii)) and Class F and for no other use without the granting of a specific planning permission.

Conditions applicable to that part of the application which was submitted in outline and without full details

Outline Permission (Reserved matters)

36. Prior to the commencement of each phase of development, details of the appearance, layout and scale, (hereinafter called the 'reserved matters') for that phase shall be submitted to and approved in writing by the local planning authority. The development of each phase shall be carried out as approved.

Time Limit

37. Application(s) for approval of the reserved matters for any phase in outline shall be made to the local planning authority before the expiration of five years from the date of this permission. The development of each outline phase shall commence before the expiration of three years from the date of approval of the last of the reserved matters of that phase to be approved.

38. The development hereby permitted shall be carried out in accordance with the approved documents as listed at Schedule 2 of this decision, save for where such details are superseded by further details being submitted to and approved by the local planning authority pursuant to the conditions attached to this permission.

Quantum of Development (compliance)

39. The development pursuant to the outline element of this permission of the uses listed below shall not exceed the following development levels:

a) three residential blocks providing up to 425 residential (Use Class C3) units.
b) up to 1,366sqm of flexible Class E and Class F floorspace (excluding Class E (g) (iii)) at ground floor level of the residential blocks.
c) two commercial buildings providing up to 22,538 sqm of Classes E(g) i(offices) and ii (research and development) floorspace (NIA).
d) up to 1,366 sqm of flexible Class E and Class F floorspace (NIA) (excluding Class E (g),(iii)) at ground floor level of the two commercial buildings.

Residential amenity

Internal Noise Levels

40. Each reserved matters application for a phase containing residential development pursuant to this outline permission shall include (for the written approval of the local planning authority) a noise assessment and noise attenuation / insulation scheme for such residential development (having regard to the building's fabric, glazing and mechanical ventilation requirements) identifying measures to protect occupiers of that residential development from traffic noise emanating from Milton Road, the A14, primary routes through the site, and the Cambridge Guided Busway, which shall be submitted to the local planning authority for approval.

The noise insulation scheme for a reserved matters application shall demonstrate that the external and internal noise levels recommended in British Standard 8233:1999 "Sound Insulation and noise reduction for buildings-Code of Practice" (or as superseded) can be reasonably achieved for the relevant part of the development and shall include a timescale for phased implementation of any recommended mitigation measure contained in the assessment.

The scheme for each part of the residential development within a phase or part thereof as approved shall be fully implemented prior to first occupation of that part of the residential development and shall thereafter be retained in perpetuity.

Housing Mix

41. Applications for reserved matters for a phase of development which contains residential units shall include the following details of housing mix:

a) A plan showing the location and distribution of market and affordable units (including tenure type)

b) Internal areas for each unit of accommodation; and

c) A schedule of dwelling sizes (by number of bedrooms).

Residential Space Standards

42. For each reserved matters application for a phase of development containing residential development pursuant to this outline permission details of the layout of the dwelling(s) as required by condition 36 above, shall demonstrate that all the dwelling(s) meet or exceed the Government's Technical Housing Standards - Nationally Described Space Standard (2015) or successor document.

M4(2) Units

43. At least 5% of all residential units within each reserved matters phase of development shall be designed to meet the accessible and adaptable dwellings M4 (2) standard of the Building Regulations 2010 (as amended) or successor document. A compliance statement shall be submitted with any reserved matters application for layout in relation to any phase of development or part thereof containing residential development pursuant to this outline permission to demonstrate the key principles have been achieved. In the event that such standards are replaced by an alternative national measure for building design applicable at the time of submission of any reserved matters application then the equivalent measures shall be applicable to the relevant part of the proposed development.

Lift access

44. Within any reserved matters application for a phase of development containing residential development pursuant to this outline permission details of any lifts proposed within the proposed residential building(s) shall be provided. The lifts shall be retained and maintained in a safe and operational condition for the lifetime of the building(s) which they serve.

Sustainability

Sustainability and Energy Statements

45. Each reserved matters application for a phase of development pursuant to this outline permission shall be accompanied by a Sustainability Statement setting out how the proposals meet the sustainability targets and commitments set out in the Cambridge North Sustainability Strategy, Hoare Lea, Revision 03 26 May 2022 as updated by (i) the Addendum to the Sustainability Strategy, Hoare Lea, Revision 1, 23 August 2022; (ii) the Cambridge North Energy Strategy, Hoare Lea, Issue 01 27 May 2022; and (iii) the Energy Strategy Addendum, Hilson Moran, 20 September 2022. Where the statement relates to part of the residential development, the statement shall also include details for the development of separate energy consumption targets for that part of the residential development within the phase of development.

The Sustainability Statement shall be subsequently implemented in full accordance with the approved details and maintained thereafter.

Water Conservation

46. Each reserved matters application for a phase of development pursuant to this outline permission which include a residential component shall be accompanied by a Water Conservation Strategy for the written approval of the local planning authority. The strategy shall include a water efficiency specification for each dwelling type, based on the Fitting Approach set out in Part G of the Building Regulations 2010

(2015 edition or any future successor) demonstrating that all dwellings (when considered as a whole) are able to achieve a typical design standard of water use of no more than 89 litres/person/day, as far as reasonably practicable. The approved strategy for a residential dwelling shall be subsequently implemented in full accordance with the approved details prior to first occupation of that residential dwelling and thereafter shall be retained.

Broadband provision (compliance)

47. No dwelling shall be first occupied until the necessary infrastructure to enable that dwelling to directly connect to and receive fibre optic broadband is installed and is capable of being fully operative.

Change of Use Class E & F (compliance)

48. Notwithstanding the provisions of Article 3 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that order with or without modification), the ground floor use of the commercial and residential buildings shall only be used for uses within Class C3, Class E (excluding Class E (g) (iii)) and/or Class F and for no other use. The exception to this is the community room to be provided in Building S13-S16 which shall be used for uses within Use Class F2(b) only and for no other for no other use.

49. The dwellings and commercial accommodation hereby permitted shall not be occupied until either the Grafham Transfer is operational, or the Water Resources Management Plan for the Cambridge Water operating area covering the period 2025 to 2050 is published following approval by the Secretary of State and any intervention measures necessary to maintain and deliver water in advance of the Grafham Transfer have been implemented.

SCHEDULE 1 – APPROVED PLANS FOR THE FULL APPLICATION

DRAWING REFERENCE	TITLE	DATE
Site-Wide - General		
239-ACME-PLA-S00-0010	Location Plan	June 2022
239-ACME-PLA-S00-0011	Site Plan	June 2022
Site-Wide Landscape Plans - Detail		
630_01(MP)001 P5	Landscape Masterplan	April 2023
630_01(MP)002 P3	Ecology Strategy Ground Floor	April 2023
630_01(MP)003 P1	Ecology Strategy Roof	June 2022
630_01(MP)004 P3	Public Open Space Provision	April 2023
630_01(MP)005 P2	Hard Landscape Strategy (West)	October 2022
630_01(MP)006 P2	Hard Landscape Strategy (East)	October 2022
630_01(MP)007 P2	Hard Landscape Strategy (Wild Park)	October 2022
630_01(MP)008 P2	Tree Strategy	October 2022
630_01(MP)009 P1	Planting Strategy (West)	June 2022
630_01(MP)010 P1	Planting Strategy (East)	June 2022
630_01(MP)011 P1	Levels and Drainage (West)	June 2022
630_01(MP)012 P1	Levels and Drainage (East)	June 2022
630_01(MP)013 P1	Levels and Drainage (Wild Park)	June 2022
630_01(MP)014 P3	Attenuation Strategy	April 2023
630_01(MP)015 P1	Furniture Strategy (West)	June 2022
630_01(MP)016 P1	Furniture Strategy (East)	June 2022
630_01(MP)017 P1	Furniture Strategy (Wild Park)	June 2022
630_01(MP)019 P1	Roof Strategy	June 2022
630_01(MP)020 P3	Tree Root Cell Extents	April 2023
630_01(MP)021 P2	Wild Park and Aggregates Yard Interface	October 2022
630_01(MP)022 P1	Cycle Strategy (West)	October 2022
630_01(MP)023 P1	Cycle Strategy (East)	October 2022
630_01(MP)024 P1	Proximity to Mineral Safeguarded areas	October 2022
630_01(MP)101 P1	Milton Avenue 1 of 2	June 2022
630_01(MP)102 P1	Milton Avenue 2 of 2	June 2022
630_01(MP)103 P2	Chesterton Way 1 of 3	October 2022
630_01(MP)104 P2	Chesterton Way 2 of 3	October 2022
630_01(MP)105 P2	Chesterton Way 3 of 3	October 2022
630_01(MP)106 P2	Cowley Road North	October 2022
630_01(MP)107 P2	Cowley Road East	October 2022
630_01(MP)108 P1	The Link	June 2022
630_01(MP)109 P2	Bramblefields Way	October 2022
630_01(MP)201 P2	1 Milton Avenue and Milton Walk	October 2022
630_01(MP)202 P2	Chesterton Square	October 2022
630_01(MP)203 P2	Station Row	October 2022
630_01(MP)204 P1	Station Row Features	June 2022
630_01(MP)205 P2	Piazza	October 2022
630_01(MP)206 P1	Station Row Passage	June 2022
630_01(MP)207 P1	Chesterton Passage	June 2022

630_01(MP)208 P1	Cowley Circus	June 2022
630_01(MP)209 P3	Wild Park	April 2023
630_01(MP)210 P2	Typical Meanwhile Use for Pocket Park	October 2022
630_01(MP)212 P1	Roof Garden – Labs	June 2022
630_01(MP)213 P1	Roof Garden – 1 Milton Avenue	June 2022
630_01(MP)301 P1	Residential Masterplan	June 2022
630_01(MP)304 P1	Play Areas – LEAP and LAP	June 2022
630_01(MP)305 P1	Play Areas – Natural Play	June 2022
630_01(MP)306 P1	Play Areas – Wild Park	June 2022
630_01(MP)307 P1	Residential Roof Garden Masterplan	June 2022
630_01(MP)308 P1	Roof Garden Features	June 2022
630_01(CD)001 P1	Typical Tree pit in hard landscaping	June 2022
630_01(CD)002 P1	Typical Tree pit in soft landscaping	June 2022
630_01(CD)003 P1	Typical Tree pit in raised planter over basement	June 2022
Site-Wide Highways Plans - Detail		
05425-C-2203-P2	Fire Tender Tracking (Sheet 1 of 2)	October 2022
05425-C-2204-P2	Fire Tender Tracking (Sheet 2 of 2)	October 2022
05425-C-2205-P1	Lab Servicing Access Swept Path Analysis Refuse Vehicle	June 2022
05425-C-2206-P2	Rigid Truck Tracking	October 2022
05425-C-2207-P1	Refuse Vehicle Tracking (Plan)	June 2022
05425-C-2208-P0	Whole Site Refuse Vehicle Tracking	October 2022
Building S04		
1781-MAKE-S04-PA1999 Rev 01	S4 Basement Plan	October 2022
1781-MAKE-S04-PA2000 Rev 01	S4 Ground Floor Plan	October 2022
1781-MAKE-S04-PA2001 Rev 01	S4 Level 01 Plan	October 2022
1781-MAKE-S04-PA2002 Rev 01	S4 Levels 02-04 Typical Plan	October 2022
1781-MAKE-S04-PA2005 Rev 01	S4 Level 05 Plan	October 2022
1781-MAKE-S04-PA2006 Rev 01	S4 Level 06 Plan	October 2022
1781-MAKE-S04-PA2007 Rev 01	S4 Level 07 Plan: Plant	October 2022
1781-MAKE-S04-PA2008 Rev 01)	S4 Roof Plan	October 2022
1781-MAKE-S04-PA2200	S4 Proposed East Elevation	June 2022
1781-MAKE-S04-PA2201	S4 Proposed South-East Elevation	June 2022
1781-MAKE-S04-PA2202	S4 Proposed South-West Elevation	June 2022
1781-MAKE-S04-PA2203	S4 Proposed North-West Elevation	June 2022
1781-MAKE-S04-PA2250 Rev 01	S4 Proposed Section AA and Section BB (Short and Long Section)	October 2022
Building S05		

239-ACME-PLA-S05-0100	S5 Location Plan	June 2022
239-ACME-PLA-S05-1100	S5 Ground Floor Plan	June 2022
239-ACME-PLA-S05-1101	S5 First Floor Plan	June 2022
239-ACME-PLA-S05-1102	S5 Second Floor Plan	June 2022
239-ACME-PLA-S05-1103	S5 Third Floor Plan	June 2022
239-ACME-PLA-S05-1104	S5 Fourth Floor Plan	June 2022
239-ACME-PLA-S05-1105	S5 Roof Plan	June 2022
239-ACME-PLA-S05-1110	S5 Basement Plan Acme	June 2022
239-ACME-PLA-S05-1200	S5 Mobility Hub Section	June 2022
239-ACME-PLA-S05-1300	Western And Eastern Elevations	June 2022
239-ACME-PLA-S05-1301	Northern And Southern Elevations	June 2022
Building S06 and S07		
1818-MAKE-S06-PA1949 Rev 01	S6 and S7 Combined Basement Plan	October 2022
1818-MAKE-S06-PA1950 Rev 02	S6 and S7 Combined Ground Floor Plan	October 2022
1818-MAKE-S06-PA1999 Rev 01	S6 Basement Plan	October 2022
1818-MAKE-S06-PA2000 Rev 02	S6 Ground Floor Plan	October 2022
1818-MAKE-S06-PA2001	S6 Levels 01-02 Typical Plan	June 2022
1818-MAKE-S06-PA2003	S6 Level 03 Plan	June 2022
1818-MAKE-S06-PA2004	S6 Level 04 Plan: Plant	June 2022
1818-MAKE-S06-PA2005	S6 Roof Plan	June 2022
1818-MAKE-S07-PA1999 Rev 01	S7 Basement Plan	October 2022
1818-MAKE-S07-PA2000 Rev 02	S7 Ground Floor Plan	October 2022
1818-MAKE-S07-PA2001	S7 Levels 01-02 Typical Plan	June 2022
1818-MAKE-S07-PA2003	S7 Level 03 Plan	June 2022
818-MAKE-S07-PA2004	S7 Level 04 Plan: Plant	June 2022
818-MAKE-S07-PA2005	S7 Roof Plan	June 2022

1818-MAKE-S06-PA2150 Rev 01	S6 and S7 Combined North-West Elevation	October 2022
1818-MAKE-S06-PA2151 Rev 01	S6 and S7 Combined South-East Elevation	October 2022
1818-MAKE-S06-PA2200 Rev 01	S6 Proposed North-West Elevation	October 2022
1818-MAKE-S06-PA2201	S6 Proposed North-East Elevation	June 2022
1818-MAKE-S06-PA2202 Rev 01	S6 Proposed South-East Elevation	October 2022
1818-MAKE-S06-PA2203	S6 Proposed South-West Elevation	June 2022
1818-MAKE-S06-PA2240	S6 and S7 Proposed Combined Section AA (Long Section)	June 2022
1818-MAKE-S06-PA2250	S6 Proposed Section BB and Section CC (Short and Long Section)	June 2022
1818-MAKE-S07-PA2200 Rev 01	S7 Proposed North-West Elevation	October 2022
1818-MAKE-S07-PA2201 Rev 01	S7 Proposed North-East Elevation	October 2022
1818-MAKE-S07-PA2202 Rev 01	S7 Proposed South-East Elevation	October 2022
1818-MAKE-S07-PA2203	S7 Proposed South-West Elevation	June 2022

SCHEDULE 2 – APPROVED PLANS FOR THE OUTLINE APPLICATION

Drawing reference	title	Date
239-ACME-PLA-S01-0101 Rev A	Existing Site Conditions	October 2022
239-ACME-PLA-S01-0102 Rev A	Building Layout and Application Type	October 2022
239-ACME-PLA-S01-0103 Rev A	Maximum Building Envelope – Basement	October 2022
239-ACME-PLA-S01-0104 Rev A	Maximum Building Envelope – Ground Floor Level	October 2022
239-ACME-PLA-S01-0105 Rev A	Maximum Building Envelope – Typical Level	October 2022
239-ACME-PLA-S01-0106 Rev A	Building Heights Plan	October 2022
239-ACME-PLA-S01-0107 Rev A	Proposed Uses – Ground Floor	October 2022

239-ACME-PLA-S01-0108 Rev A	Access Plan	October 2022
239-ACME-PLA-S01-0109 Rev A	Landscape and Open Spaces Plan	October 2022
239-ACME-PLA-S01-0300	Parameter Plans Area Schedule	June 2022

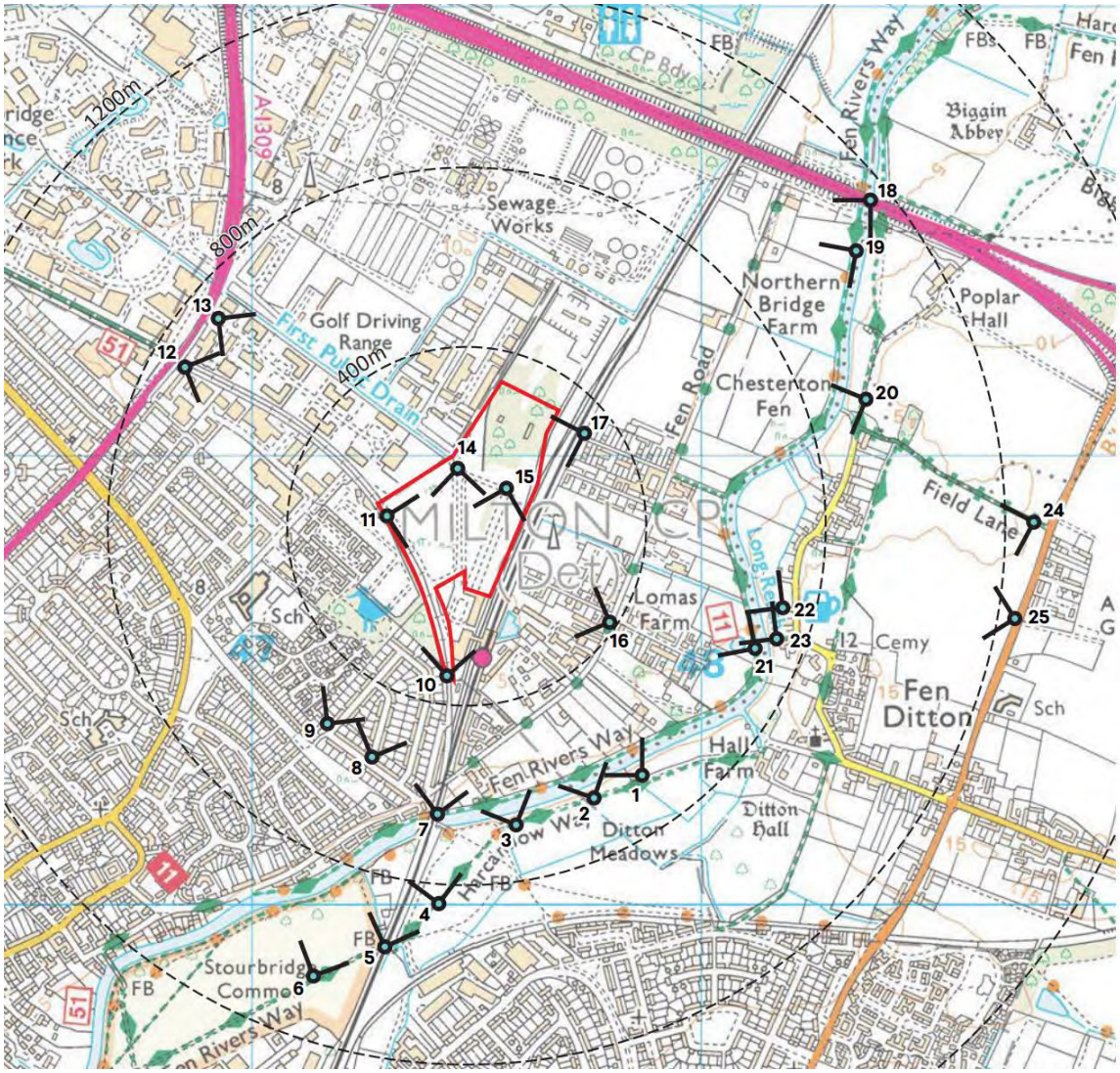
Annex E

Bidwell (LVIA) Viewpoints and Comparative Node (Council) Viewpoints

Bidwell Viewpoint	Node Viewpoint
Viewpoint 2 Bramblefields LNR	8,9
Viewpoint 4 Milton Road/Cowley Park:	13
Viewpoint 5 Ditton Meadows	1,2,3
Viewpoint 6 Fen River Way	19,21
Viewpoint 8 Harcamlow Way, north of Fen Ditton	20
Viewpoint 9 Horningsea Road/Field Lane	24,25
Viewpoint14 Milton Road	12
Viewpoint 16 Stourbridge Common	5 ,6
Viewpoint 20 A14 Bridge over the River Cam	18
Viewpoint E1 Chisholm Trail bridge over River Cam	7
Viewpoint E5 Guided Busway and Discovery Way	11
Viewpoint E6 Fen Road	16,17

LVIA Viewpoints (ES Appendix 12.3 Page 2)

Node Viewpoints CD9.10 Appendix 5



Department for Levelling Up, Housing & Communities

www.gov.uk/dluhc

RIGHT TO CHALLENGE THE DECISION IN THE HIGH COURT

These notes are provided for guidance only and apply only to challenges under the legislation specified. If you require further advice on making any High Court challenge, or making an application for Judicial Review, you should consult a solicitor or other advisor or contact the Crown Office at the Royal Courts of Justice, Queens Bench Division, Strand,London,WC2 2LL (0207 947 6000).

The attached decision is final unless it is successfully challenged in the Courts. The Secretary of State cannot amend or interpret the decision. It may be redetermined by the Secretary of State only if the decision is quashed by the Courts. However, if it is redetermined, it does not necessarily follow that the original decision will be reversed.

SECTION 1: PLANNING APPEALS AND CALLED-IN PLANNING APPLICATIONS

The decision may be challenged by making an application for permission to the High Court under section 288 of the Town and Country Planning Act 1990 (the TCP Act).

Challenges under Section 288 of the TCP Act
With the permission of the High Court under section 288 of the TCP Act, decisions on called-in applications under section 77 of the TCP Act (planning), appeals under section 78 (planning) may be challenged. Any person aggrieved by the decision may question the validity of the decision on the grounds that it is not within the powers of the Act or that any of the relevant requirements have not been complied with in relation to the decision. An application for leave under this section must be made within six weeks from the day after the date of the decision.

SECTION 2: ENFORCEMENT APPEALS

Challenges under Section 289 of the TCP Act
Decisions on recovered enforcement appeals under all grounds can be challenged under section 289 of the TCP Act. To challenge the enforcement decision, permission must first be obtained from the Court. If the Court does not consider that there is an arguable case, it may refuse permission. Application for leave to make a challenge must be received by the Administrative Court within 28 days of the decision, unless the Court extends this period.

SECTION 3: AWARDS OF COSTS

A challenge to the decision on an application for an award of costs which is connected with a decision under section 77 or 78 of the TCP Act can be made under section 288 of the TCP Act if permission of the High Court is granted.

SECTION 4: INSPECTION OF DOCUMENTS

Where an inquiry or hearing has been held any person who is entitled to be notified of the decision has a statutory right to view the documents, photographs and plans listed in the appendix to the Inspector's report of the inquiry or hearing within 6 weeks of the day after the date of the decision. If you are such a person and you wish to view the documents you should get in touch with the office at the address from which the decision was issued, as shown on the letterhead on the decision letter, quoting the reference number and stating the day and time you wish to visit. At least 3 days notice should be given, if possible.

APPENDIX 9
THRAPSTON APPEAL DECISION (PINS REFERENCE: 3362393)

Planning Inspectorate

Appeal Decision

Inquiry held on 22-25 July, 5-8 August and 12-13 August 2025

Site visits made on 21 July, 25 July, 4 August and 8 August 2025

by R Catchpole BSc (hons) PhD CEcol MCIEEM IHBC

an Inspector appointed by the Secretary of State

Decision date: 22nd October 2025

Appeal Ref: APP/M2840/W/25/3362393
Land East of Halden's Parkway, Thrapston, Northamptonshire (Easting: 501623 Northing: 278262)

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a failure to determine a planning application.
- The appeal is made by Mr Benjamin Taylor (Equites Newlands (Thrapston East) Ltd and Mrs M Linell) against North Northamptonshire Council.
- The application reference is NE/22/00151/FUL.
- The development proposed is described as a hybrid planning application comprising storage and distribution (Use Class B8) space with ancillary offices; associated infrastructure including earthworks, parking, servicing; and landscaping including new public access links into the site (Outline); with full details of access, and the erection of a storage and distribution unit (Use Class B8) with ancillary offices, access, parking, servicing and landscaping, and, the demolition of all existing buildings and structures, and the re-alignment of an existing farm track (Full).

Decision

1. The appeal is allowed and planning permission is granted for a hybrid planning application comprising storage and distribution (Use Class B8) space with ancillary offices; associated infrastructure including earthworks, parking, servicing; and landscaping including new public access links into the site (Outline); with full details of access, and the erection of a storage and distribution unit (Use Class B8) with ancillary offices, access, parking, servicing and landscaping, and, the demolition of all existing buildings and structures, and the re-alignment of an existing farm track (Full) at Land East of Halden's Parkway, Thrapston, Northamptonshire (Easting: 501623 Northing: 278262) in accordance with the terms of the application, Ref: NE/22/00151/FUL, subject to the planning obligation and conditions set out in the schedule at the end of this decision.

Application for Costs

2. An application for a full or partial award of costs was made by the appellant against North Northamptonshire Council. This application is the subject of a separate decision that will be issued after this decision.

Preliminary Matters

3. The Inquiry sat on non-consecutive days between 22 July 2025 and 13 August 2025. Unaccompanied site visits were carried out on 21 July, 25 July, 4 August and 8 August 2025. The final three site visits were carried out according to an agreed itinerary which included a driving route and a series of viewpoints in the

wider countryside. An accompanied site visit was also carried out on the 25 July 2025 with representatives of the main parties and a Rule 6(6) party. The Inquiry also sat on the evening of the 5 August 2025 to facilitate interested party submissions.

4. This appeal is against the failure of the Council to issue a decision within the prescribed period. The putative reasons for refusal by the Council are set out in the minutes of the Planning Committee, dated 11 June 2025 and further refined in the Statement of Common Ground (SoCG) between the Council and the appellant. This is the basis upon which I have determined this appeal.

5. As the proposal potentially affects the setting of listed buildings, I have had special regard to section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act).

6. A full application was submitted for Plot 1 in the southwestern corner of the appeal site whilst an outline application, with all matters reserved apart from access, was submitted for the remaining plots. I have had regard to the relevant plans, including the parameters plan, which controls the extent of the outline development.

7. An Environmental Statement (ES) was submitted with the application in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 (the EIA Regulations).

8. This was subsequently amended through the submission of further information comprising an ES Addendum and a Non-Technical Summary. These were submitted as part of further appeal submissions made by the appellant on the 26 June 2025. These documents were duly published in the online Core Document (CD) library[1].

9. The addendum sought to address issues raised by the Planning Inspectorate in relation to the adequacy of the ES. This comprised the definition of significant effects, the provision of a non-technical summary and the extent of best and most versatile land (BMV) that would be affected by the proposal.

10. Opportunities to consider this evidence were present during the course of the Inquiry. Consequently, interested parties had an opportunity to comment and were not prejudiced by its introduction.

11. Given the above, I am satisfied that both the coverage and technical detail of the ES provided an adequate assessment of the environmental effects of the proposed development. Although the area of BMV was disputed, I have no substantiated, alternative technical evidence before me that would lead me to a different conclusion. I note that a previous survey suggested higher grade land was present but that this would only amount to an additional loss of 1.7 hectares (ha) of BMV which I do not consider to be significant in terms of the overall effect. I also find it sufficient to describe the impact of the reserved matters that are still to be approved.

12. Consequently, the ES, together with the other evidence that was submitted during the course of the Inquiry, meets the requirements of the EIA Regulations. A full

[1] CD 1.3.30

account has been taken of all environmental information in my assessment of the proposal and this has informed my decision.

13. Three parties were given Rule 6(6) status which included Save Titchmarsh and Upper Nene Countryside and Habitats (STAUNCH), Harworth Estates and Investments Ltd (Harworth) and IM Properties Development Ltd (IM).

Main Issues

14. The main issues are:

- the effect on the character and appearance of the surrounding area with regard to the open countryside;
- whether it would preserve the settings, as they relate to the special interest of the Grade I listed buildings known as the "Church of St Mary the Virgin" (Ref: 1265555), the "Church of All Saints" (Ref: 1191528) and the "Church of St Peter" (Ref: 1040308), the Grade II* listed building known as the "Church of St Michael and All Angels (Ref: 1227141) and the significance of Titchmarsh Conservation Area;
- the effect on the significance of scheduled monuments known as "Titchmarsh Roman Town" (Ref: 1485751) and "Titchmarsh Castle Moated Site and Fishponds" (Ref: 1011038) as well as a non-designated heritage asset comprising Castle Manor Farm;
- whether there would be an adverse effect on the integrity of the Upper Nene Gravel Pits Special Protection Area and Ramsar site;
- whether it would preserve the special scientific interest of Titchmarsh Meadows Site of Special Scientific Interest;
- whether it would be in a sustainable location with regard to limiting the need to travel and ensuring a genuine choice of transport modes;
- the effect of the proposal on the safe and efficient operation of the highway network;
- whether there is an established employment and logistics need for the proposal; and
- whether the site is appropriate for development having regard to local and national planning policies that seek to manage the location of new development.

Reasons

Site and Surroundings

15. The appeal site (the Site) covers an area of around 75 ha. It includes a former sand and gravel quarry covering an area of approximately 15 ha. This area subsequently became a landfill waste site before being remediated. The Site is situated to the north of the A14, on the eastern side of Thrapston. It lies immediately to the east of Halden's Parkway employment area. It is separated by a minor road ('Islington') which runs along the western site boundary. The A14 runs along the southern site boundary.

16. Castle Manor Farm is located within the site boundary, towards the southeastern corner. A second residential property, Rectory Farm Bungalow, is located on the southwestern edge of the site on Islington. Both would be demolished as part of the proposed development. A third residential property, Rectory Farm House, lies outside of the southern boundary, adjacent to the A14. This is subject to a legal agreement which would lead to its demolition in the event that planning permission is granted.

17. A number of Public Rights of Way (PRoW) are present in the wider landscape. These are generally situated to the north and east of the Site and include a number of routes that radiate from Titchmarsh, which lies to the north. Routes also extend across the landscape, to the west and the north of Titchmarsh, which connect it with the River Nene valley to the west of the Site. There are no PRoW within the site itself.

Proposed Development

18. The application is in hybrid form with full planning permission sought for an initial phase of development of around 16 ha. This would result in a storage and distribution area, with ancillary offices and associated works. The proposed building on Plot 1 would have a gross internal area of around 49,704 m^2. This would include a warehouse (Use Class B8) as well as ancillary office space (Use Class E). Full planning permission is also sought for the principal estate road and site access, as well as the ancillary areas associated with Plot 1.

19. The remaining plots are in outline with an indicative masterplan showing how they might be developed. The parameters plan identifies a single development zone within the Site. This is capable of accommodating a range of storage and distribution (Use Class B8) building types and sizes. Up to 6 further buildings are proposed, subject to reserved matters, as defined on the parameters plan. The area where these buildings and ancillary infrastructure would be located is defined by a future development plateau covering an area of around 34 ha. This means that around 50 ha of the site would be occupied by built infrastructure.

20. All buildings would be restricted to a maximum ridge height of 24 metres (m). This would be fixed, via the parameters plan, to a maximum height of 79.5 m Above Ordnance Datum (AOD), based on a finished floor level of 54.5 to 55.5 m AOD. This approach means the development plateau, upon which the proposed buildings would sit, would be below the ground level of Halden's Parkway. Whilst the maximum height of the proposed buildings may be taller than the neighbouring buildings in absolute terms, in relative terms, the proposed buildings would sit at a slightly lower level.

21. The proposed site access would be formed by a new roundabout from the junction of Huntingdon Road and Islington, in the south-western corner of the site. Traffic restrictions and site management measures have been proposed to prevent HGVs (Heavy Goods Vehicle) turning right and going north, along Islington.

22. The proposed parameters for the outline scheme also include a landscaped earthwork bund around a significant part of the site boundary. The proposed structure would vary in height and would typically be between 7 m and 10 m higher than the lowered ground levels within the Site.

23. The bunding would be subject to structural planting. This would include new woodland and other planting which would form part of the wider landscaping and proposed green infrastructure. In addition, the scheme includes a new potential 'greenway' link outside of the bund, with planting along its northern edge, running past the proposed sustainable drainage and on-site biodiversity gain area.

24. The proposal would also include: highway upgrade works at the A14 Junction 13 and two other junctions along the A605 to the west of the site; the provision of new drainage features as part of a site-wide Sustainable Drainage System (SUDS) strategy; a new pedestrian/ cycle path along the northern edge of the site extending from Islington to the west and linking to existing permissible routes to the east; improved cycle and pedestrian links from the Site to Thrapston; and the diversion of the existing access track to the retained farm buildings to the south of the site, adjacent to the A14.

Policy Context

25. For the purposes of Section 38(6) of the Town and Country Planning Act 1990, the development plan for the area comprises:

- North Northamptonshire Joint Core Strategy 2011 - 2031 (2016) (JCS)
- East Northamptonshire Part 2 Local Plan (2023) (LP)

26. Specific policies of relevance in the JCS are as follows:

- Policy 1 (Sustainable Development) This policy states that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework 2024 (the Framework). It goes on to state that sustainability, within the context of North Northamptonshire, means contributing to delivering the Plan Vision and Outcomes through compliance with the relevant policies of the development plan.
- Policy 2 (Historic Environment) This policy seeks to ensure that development proposals conserve and, where possible, enhance the heritage significance and setting of heritage assets in a manner commensurate to their significance. It goes on to state that proposals should complement the surrounding historic environment through the form, scale, design and materials that are used as well as protect and, where possible, enhance key views and vistas of heritage assets, including the church spires along the Nene Valley and across North Northamptonshire.
- Policy 3 (Landscape Character) This policy seeks to conserve and, where possible, enhance the character and qualities of the local landscape through appropriate design and management. It also seeks to protect landscape setting and ensure that development proposals contribute to maintaining the individual and distinct character of landscapes as well as the separate identities of settlements by preventing coalescence. It stresses the need to provide appropriate landscape mitigation.
- Policy 4 (Biodiversity and Geodiversity) This policy seeks to secure a net gain for biodiversity and protect key assets for wildlife and geology, in particular, the Upper Nene Valley Gravel Pits Special Protection Area and

Ramsar Site. It highlights the need for Habitats Regulations Assessment for all proposals likely to have an adverse impact on this site. More widely, it seeks to reverse the decline in biodiversity and restore ecological networks, at a landscape scale, in the Nene Valley Nature Improvement Area and stresses the need for protection and recovery of priority habitats and species linked to national and local targets through good design and developer contributions. It recommends that permission is refused for development proposals where significant harm to biodiversity and geodiversity assets cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations. Among other things, it states that development proposals need to take account of the Upper Nene Valley Gravel Pits Special Protection Area and Northamptonshire Biodiversity Supplementary Planning Documents.

- Policy 5 (Water Environment) This policy seeks to ensure that development contributes to reducing the risk of flooding and the protection and improvement of the quality of the water environment. Among other things, proposals should incorporate SUDS wherever practicable, to reduce flood risk, improve water quality and promote environmental benefits.

- Policy 8 (North Northamptonshire Place Shaping Principles) This policy seeks, among other things, to ensure high quality development is achieved by creating connected places, making safe and pleasant streets and spaces, ensuring spaces are adaptable and flexible, creating a distinctive local character and ensuring quality of life, health and safety of communities.

- Policy 10 (Provision of Infrastructure) This policy seeks to ensure the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from specific development and to support the wider development of North Northamptonshire.

- Policy 11 (Network of Areas) This policy seeks to distribute development to strengthen the network of settlements in accordance with the roles in Table 1 and to support delivery of the place-shaping principles set out in Table 2. In particular, it states that Growth Towns will be the focus for infrastructure investment and higher order facilities to support major employment, housing, retail and leisure development. Market Towns, such as Thrapston, will provide a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town.

- Policy 15 (Well Connected Towns) This policy seeks to strengthen connectivity within and around settlements by managing various aspects of development. This includes designing development to give priority to sustainable means of transport.

- Policy 16 (Connecting the Network of Settlements) This policy seeks to strengthen connections between the towns in the Northamptonshire Arc and improve links between the Market Towns and train stations. Among other things, it specifies particular road infrastructure that is required to facilitate development.

- Policy 22 (Delivering Economic Prosperity) This policy seeks to build a stronger more sustainable economy that will deliver a net increase of 31,100 jobs through a number of priority sectors, including logistics.

- Policy 23 (Distribution of New Jobs) This policy sets out the jobs expected to be created through the committed employment sites and sets a minimum target of 31,100 jobs in North Northamptonshire.

- Policy 24 (Logistics) This policy states that logistics proposals, including large scale strategic distribution, will be supported where they comply with the spatial strategy, facilitate the delivery of a mix of jobs and are of the highest viable standards of design and sustainability. It goes on to set out a number of criteria that must be met. Among other things, it requires proposals to have good access to a local labour supply and be accessible to the local workforce through public transport, walking and cycling. Proposals must also provide sufficient infrastructure to mitigate any highway impacts.

27. Specific policies of relevance in the LP are as follows:

- Policy EN1 (Spatial Development Strategy) This policy defines the settlement hierarchy in accordance with the spatial roles set out in the JCS (Table 1) along with local considerations for assessing development proposals. It supports major committed development in Thrapston and provides greater detail on how development should occur in other settlements.

- Policy EN2 (Development Principles) This policy defines the circumstances where development will be generally supported. Among other things, this includes where it would not harm a settlement's character, form, or the surrounding countryside, including the need to avoid compromising key views, heritage assets and their settings, respect the importance of open, greenspace areas within the built-up form of the settlement and seek to conserve special landscape designations.

- Policy EN5 (Local Green Infrastructure Corridors) This policy seeks to protect and enhance local green infrastructure corridors, as identified on the Policies Map and Figure 7 of the LP.

- Policy EN10 (Health and Wellbeing) This policy requires development proposals to demonstrate how the design will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimising any negative health and wellbeing impacts.

- Policy EN11 (Design of Buildings/Extensions) This policy requires development proposals to be well related and, where possible, enhance the surrounding environment. Among other things, it should integrate positively with the surrounding area.

- Policy EN12 (Designated Heritage Assets) This policy states that where proposals affect a designated heritage asset or its setting, great weight will be given to the asset's conservation.

- Policy EN13 (Non-Designated Heritage Assets) This policy requires such assets to be conserved in a manner consistent with their significance. The

assessment of proposals for new development that would impact on the demolition or total loss an asset should take into account its significance and the scale of harm or loss.

- Policy EN15 (Development of Commercial Space) This policy states that proposals for the development of new commercial employment space will be supported where these will deliver flexible managed workspace for small medium, and micro-businesses.

Character and Appearance

28. The Site is beyond the settlement boundary and situated in the open countryside. Notwithstanding the previously worked land, it has the appearance of rolling, arable farmland that typifies the open areas to the north and east. The field size is relatively large and reflective of modern farming practices.

29. It is partially defined and enclosed by existing hedgerows as well as by the surrounding roads. The southern site boundary includes a relatively continuous, mature belt of trees. A triangular, wooded copse also adjoins the northern site boundary. Open farmland lies beyond the site to the north and east as well as to the south, beyond the A14.

30. The A14 undermines what would otherwise be a tranquil location. The Site is also influenced by the built form of Halden's Parkway to the west, although this is partly mitigated by the mature perimeter planting that is present. The uncultivated, previously worked area has an unkempt, post-industrial visual quality resulting from the ruderal vegetation that has since developed but it nevertheless contributes to the overall openness of the Site.

31. The wider landform is shaped by the River Nene and its tributaries. The site lies beyond the higher eastern valley slopes of the River, within a rolling tributary valley. The land within the Site generally falls towards the east and northeast from the western boundary and Islington. Halden's Parkway development, to the west, occupies higher ground, as does Islington which follows a ridgeline to Titchmarsh. Higher ground is also situated to the east.

32. Titchmarsh and Polopit lay beyond a secondary ridge situated between the Site and the settlement area which occupies a position on the more open southern slopes of the Thorpe Brook tributary valley. It has a more open aspect to the north. I observed that views of the settlement are limited from within the Site, due to the rising ground and intervening vegetation, but that the playing fields and a number of buildings can nevertheless be seen from its northeastern reaches.

33. The Site is not situated within a landscape that is subject to any national, local or other statutory or non-statutory landscape designations. The main parties agree that it is not a 'valued landscape' in policy terms, nor has it been identified as such by STAUNCH. Whilst I recognise the value that is placed on it by the local community, it does not have any particular landscape qualities that elevate it above any other intensively managed, arable landscape which would make it demonstrably different.

34. At a local scale[2], the Site lies within Landscape Character Area 12c 'Thrapston to Warmington'. This sits within the 'Limestone Valley Slopes' Landscape Character Type (LCT). Among other things, the key characteristics of this LCT include:

    - gently undulating farmed slopes bordering the Nene and its principal tributaries;
    - expansive long distance views and wide panoramas across the valley to neighbouring landscapes;
    - very sparse woodland cover comprising small deciduous and occasionally coniferous shelterbelts limiting the sense of exposure locally; and
    - fields generally enclosed by hedgerows with intermittent mature hedgerow trees.

35. Turning to the effects of the proposal. The only technical evidence I have before me on this matter comprises the appellant's Landscape and Visual Impact Assessment (LVIA) which has been completed according to published guidance[3]. There is no dispute between any of the parties concerning how the methodology has been applied nor is there any expert evidence from any accredited landscape specialist to the contrary. There is also no dispute concerning the technical basis of the photomontages that have been produced.

36. The Council agrees the level of landscape and visual harm that would result but disputes whether or not moderate adverse effects would be significant. STAUNCH also dispute the level of adverse effects after 15 years as well as the extent of the visual receptors that were agreed with the Council. The appellant accepts that there would be adverse visual and landscape effects after 15 years but that this would be 'localised'.

37. In relation to significance, the appellant's landscape witness conceded that whether or not a moderate effect was significant could 'go either way' according to published guidance[4]. This is a matter of judgement and even when made, the guidance observes that judgements of significance are not necessarily judgements of acceptability. I note that the Council's consultees on this matter, Place Services, identified significant adverse visual and landscape impacts arising from the scale and massing of the proposed units and that this objection was maintained in a subsequent response[5]. This response took account of an environmental colour assessment and proposed changes to the elevational treatment of the buildings.

38. STAUNCH maintains that the effects would be significant and that there would be a higher level of impact after 15 years. In response to one of my questions, it clarified that this would be particularly in relation to Viewpoints 1, 9 and 8 as well as, to a lesser extent, from Viewpoints 4 and 6. It also identified a number of additional viewpoints in the wider landscape that were not evaluated in the initial assessment. The appellant's landscape witness confirmed that he had subsequently evaluated the additional viewpoints but that his conclusions remained unchanged. He conceded in cross examination that localised effects can be significant but not at year 15 in this particular instance.

[2] Northamptonshire Current Landscape Character Assessment (CD 7.3)
[3] Guidelines on Landscape and Visual Impact Assessment, 3rd Edition (CD 7.5)
[4] Technical Guidance Note (LITGN-2024-01) 2024 (ID43)
[5] CD 9.1 and CD 10.4.1.8

39. It is important to appreciate that photomontages are not intended to be viewed in isolation. The nature of a photomontage and the way that this is perceived by the human eye is such that it is only a representation of the likely impact and nothing more than an aid to decision making. My own observations suggest that whilst the bunding and planting would reduce the impact from a number of viewpoints, substantive residual impacts after 15 years would nevertheless remain at Viewpoints 1, 9 and 8 as well as kinetic views along Islington given the proximity of the proposed development and the surrounding topography. This would include a fore shortening of long-distance views, a loss of hedgerows, a significant loss of openness, disruption of the gently undulating landform, an uncharacteristic increase in tree cover and the introduction of an alien landscape feature in the form of the bund. The appellant's landscape witness conceded that the slopes of the bund would be greater than the existing slopes and describes it as 'uncharacteristic' in his proof.

40. Although the structural planting, if successful, would disguise this uncharacteristic feature, it would lead to an increase in tree cover which would be contrary to the established character of the LCT. Even with this planting, there remains significant visual impacts from these viewpoints, particularly during the winter months, which I find to be significant. Furthermore, I note that the screening would be less effective when viewed from higher ground to the east where the extent of the development would be more readily appreciated. In particular, I note views of the Site from the upper reaches of the Roman road to the east of Titchmarsh, as well as a viewpoint near Chequer Hill Coppice. Whilst eastern views are within the context of the existing development at Halden's Parkway, the proposal would clearly lead to cumulative landscape harm in this context given the significant scale and massing of the proposed development.

41. STAUNCH has also pointed out that the entrance to the site, near Viewpoint 1, would be dominated by a heavily industrialised view and that there would be persistent views along the A14. Whilst an industrialised view would be inevitable on entering the Site, I note the proposed planting along the access road and the fact that it would be elevated from the main development plateau which means that a greater proportion of the buildings would be screened than would otherwise be the case on flatter ground. Consequently, the initial views would be filtered once the planting becomes established. In relation to the A14, the LVIA notes that the distribution buildings to the west of the Site are visible above the vegetation north of the road at Viewpoint 12. Whilst filtered, I observed that they nevertheless remain clearly visible during the summer months and that the proposal would add to this adverse effect.

42. Given the above, I find that the proposal would conflict with Policy 3a and 3d of the JCS that seeks to conserve and, where possible, enhance the character and qualities of the local landscape through appropriate design and management and protect the landscape setting of settlements. I also find that it would conflict with Policy 11(b) in Table 1 because the scale of the development would be inappropriate to the character of Thrapston.

Heritage

Protected Hedgerows

43. A hedgerow is deemed to be important if it has been present at a location for 30 years or more and satisfies at least one of the criteria listed in Schedule 1, Part II of the Hedgerow Regulations 1997 (as amended)[6]. These criteria relate to either archaeology and history or wildlife and landscape. I shall only focus on the former at this point. For the avoidance of doubt, I identify hedgerows according to the classification in Figure 2 of a Phase 1 Habitat Survey Report[7].

44. STAUNCH confirmed, in response to one of my questions, that the dispute over the extent of historic hedgerow that would be lost is founded on criterion 5a of the regulations. This states that an important hedgerow can be one "*recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure Acts*"[8]. This is taken as being prior to 1845, which is the earliest of the Acts, although the appellant points out that there is evidence of prior enclosure around Thrapston, as apparent from an earlier map dating from 1781[9].

45. STAUNCH maintains that there are three hedgerows that meet criteria 5a which would be lost, H13 (H8), H15 (H6) and H18 (H7). It acknowledges that it cannot unequivocally establish the presence of the last two prior to 1945 from documentary evidence. In response to one of my questions, it conceded that 5a did not apply to these hedgerows because they are not recorded in a relevant document held at a Record Office.

46. Although the third hedgerow H13 (H8) is shown on an 1817 OS map, the appellant notes that this is offset from its current location[10]. Given that mapping from this period was subject to a greater degree of cartographic interpretation and variation, in comparison to modern maps, I accept that this hedge was most likely present in 1871. Despite local enclosure being earlier, the legislation is unequivocal concerning the threshold date and the hedgerow consequently satisfies the necessary criterion.

47. Given the above, I find that around 365 m of important historic hedgerow would be lost in addition to the acknowledged loss of 780 m which qualifies under criterion 1 of the regulations.

Designated Heritage Assets

48. The parties agree that less than substantial harm would be caused to the significance of most of the designated heritage assets that I have identified through changes to their setting and that this would be at the 'lower end' of less than substantial with the exception of the Church of St Mary the Virgin in Titchmarsh. In response to one of my questions, STAUNCH confirmed that this would be at the 'higher end' because the tower would be intervisible with the proposed development. It points out that views of the tower from in and around the Site would be obstructed, including views from the south of the A14. Its heritage

[6] CD 8.5
[7] Appendix 7.1 of the ES, CD 1.3.8.1
[8] As set out in the Short Titles Act of 1896
[9] ID41
[10] ID55

statement acknowledges that there would be no intervisibility with the proposed development at ground level[11].

49. The church dates from the mid-12th century with later additions and was subject to extensive restoration in the late 19th century. It is constructed from regular coursed and squared coursed lias, limestone and cobble with lead-slate and stone-slate roof. It has an aisled nave and chancel with a west tower. The tower dates from the 15th century and is in four stages. It has a richly decorated plinth with a quatrefoil frieze surmounted with a double quatrefoil frieze. The predominant architectural style is Early English with later alterations, most markedly in the Perpendicular style. The special interest of the church is not only related to its architectural detailing and historical layering but also its function as an ecclesiastical landmark insofar as this appeal is concerned.

50. The predominant way in which this asset is experienced is associated within the immediate context of the churchyard and the surrounding, historic built environment. I note a more open area with limited views to the west but find the church to be mostly encapsulated by the village which impedes any views of the Site at ground level. Whilst views from the tower are possible, these were not designed to be viewing platforms for parishioners or the general public. Their significance lies in their function as a landmark, an expression of devotion and as a means of housing bells to call the faithful to worship. I do not find the suggestion that its setting would be dominated by the proposal to be credible given the separation distances and intervening landform. However, I do find that a number of views from the south of the Site would be impeded and result in less than substantial harm, at the lower end of the spectrum, as accepted by the appellant.

51. Titchmarsh Castle Moated Site and Fishponds lies on the south-eastern edge of Titchmarsh. It comprises the remains of the moated site of Titchmarsh Castle, a fishpond and the earthworks of the associated water management system. The moat island is almost completely surrounded by a substantial ditch 3m to 4m deep and up to 15m wide. There is an entrance causeway across the ditch in the north-west corner of the moat and in the north-east corner the ditches have been partly infilled. As the list description notes, moated sites served as prestigious aristocratic and seigneurial residences with the provision of a moat intended as a status symbol rather than a practical military defence and are important for the understanding of the distribution of wealth and status in the countryside. The significance of this asset lies in the evidential value of the below ground archaeological remains as well as its prominent, high-status location in the village.

52. There is only limited intervisibility with this asset given the topography and established vegetation and this is only one of a range of factors that are relevant to the significance of this asset. I observed that there were no views of the site from the public domain across the scheduled area but accept that there would be limited views from private land within that area. Whilst there would be changes to its agrarian context from this perspective, this would not alter the evidential value of the asset nor its spatial relationship with the settlement. Concerns have also been raised in relation to this asset regarding the effect of de-watering of the Site. I note the technical response letter, which concludes that any dewatering would not impact on the hydrological regime around this asset[12]. As a consequence, Historic

[11] CD 10.4.6
[12] CD 1.3.36

England (HE) found that it addressed earlier concerns[13]. In the absence of any technical evidence to the contrary, I find that neither the de-watering nor changes to its setting would adversely affect the significance of this asset.

53. Titchmarsh Roman Town comprises the remains of a mid-1st century AD to early-5th century AD nucleated Roman settlement of around 12 ha at the junction of a Roman road from Leicester to Godmanchester and a Roman road from Water Newton. It is close to a Roman crossing of the River Nene and is one of a series of Roman settlements along the river. It has been scheduled for a number of reasons. It is an example of a Roman settlement and only one of a 130 minor towns, four of which are located along the River Nene. The site is well documented through archaeological investigation and ariel photography and has a group value in relation to the other Roman settlements and the river crossing. Around 12 ha of the town survives with deeply stratified archaeological deposits that are likely to retain significant information.

54. It survives as below-ground remains across fields to the east and west of the A605 which bisects the site and includes a roundabout that would be subject to highway improvement works. The asset lies around 790 m to the north-west of the Site. The remains have been identified through archaeological excavations and the aerial photography of cropmarks. Additional remains, including an inhumation cemetery of around 50 burials is thought to mark the western extent of the town. No upstanding earthworks survive within the arable farmland that currently covers the majority of the site. The significance of this asset lies in the evidential value of its well-preserved, below ground remains.

55. The setting of this asset is strongly influenced by the presence of the A605. There is limited intervisibility between the Site and the scheduled area as a result of the topography and presence of intervening trees and hedges. The setting is also influenced by Halden's Parkway which is visible on the skyline from the scheduled area. Bearing in mind the separation distances and the already partly urbanised nature of the scheduled area, I do not find that the changes that would arise from the proposed development would materially affect its significance through changes to its setting.

56. Turning to direct impacts from the proposed highway improvements, STAUNCH maintains that proposed roadworks are likely to harm the important features that survive at depth in proximity to the roundabout. The appellant maintains that any such impacts would be negligible because of previous removals and recording associated with the footprint of the A605 and the fact that the proposed works would not extend beyond this zone. STAUNCH maintains that HE has not withdrawn its objection to the scheme in relation to this matter and my attention was drawn to its more recent letters[14]. I note that the one dated 7 December 2023 is the final one that substantively addresses this issue.

57. HE notes that deeply buried remains have potential to survive, despite some disturbance associated with previous roadworks and service runs. It states that the scope for detrimental impacts upon surviving buried archaeological remains to be minimised through design or avoided through limiting the existing areas of

[13] CD 10.4.6.1
[14] CD 10.4.6.1

disturbance. It also states that there was an insufficient level of detail to be certain that impacts would be avoided in the ES Addendum[15].

58. The appellant points out that HE advised that an application for scheduled monument consent should be made following any planning permission, in order for the highway construction works to take place. This work could be subject to an archaeology condition and detailed through a written scheme of investigation to be agreed between the applicant, the Council's archaeological advisors and HE.

59. Consequently, any potential impact would be mitigated through the grant of consent and archaeological monitoring and reporting thus ensuring that any archaeological remains associated with the scheduled monument are preserved. The appellant notes that similar works have been approved south-east of Orton Longueville[16]. As there is a clear mechanism to control the harm that would be caused, I am satisfied that the significance of this asset would therefore be maintained.

60. STAUNCH highlights the fact that the Zone of Theoretical Visibility[17] covers a wide area and that the proposal would be visible from additional heritage assets. In particular, listed buildings in Clopton and 'numerous parishes' as well as a Grade II listed building known as "Denford Lodge" (Ref: 1040319). However, no detail concerning precisely how the significance of any of these assets would be affected through changes to their setting is before me beyond that the proposed development might be seen in the remote distance. Consequently, I do not find any credible impact given the separation distances involved.

61. Given the above, I find that whilst the proposal would fail to preserve the special interest of the listed buildings and the significance of the CA, as it relates to their setting, I do not find any harm to the significance of the scheduled monuments either through changes to their setting or through any direct impact.

62. Paragraph 212 of the Framework advises that when considering the impact of development on the significance of designated heritage assets, great weight should be given to the asset's conservation. Paragraph 213 goes on to advise that significance can be harmed or lost through the alteration or destruction of those assets or from development within its setting and that any such harm should have a clear and convincing justification.

63. Given the separation distances and topography of the Site, I find the harm to be less than substantial in this instance but nevertheless of considerable importance and weight. I agree with the appellant that this harm would be at the lower end of less than substantial in all instances on the basis of the evidence that has been submitted as well as my own observations. Whilst such harms can have a significant cumulative effect that tips the balance into substantial harm, I do not find this to be the case in this instance.

64. Where a proposal would lead to less than substantial harm to the significance of designated heritage assets, paragraph 215 of the Framework advises that this harm should be weighed against the public benefits of the proposal. In order to do this in a comprehensive manner, the wider planning benefits that coincide with the

[15] CD 1.3.33
[16] CD 9.35
[17] Figure 8.35, CD 1.3.9.2

public benefits need to be set out. Consequently, the final heritage balance will be made after I have finished addressing the main issues.

65. Given the harm that would be caused to the designated heritage assets and historic hedgerows, I find that the proposal would be contrary to Policy 2 of the JCS and Policy EN12 of the LP and fail to satisfy the requirements of the Act and the Framework.

Non-Designated Heritage Assets

66. A small site office in the farmyard of Castle Manor Farm is recognised as having two walls built of local limestone. There is the potential that these walls survived from previous farm buildings on site or were constructed reusing stone from the demolished farm buildings when the farmyard was modernised. Additionally, further assets in the form of buried archaeological remains associated with the farm's development may be underneath the modern farm buildings. The appellant views the likely survival of any remains to be low due to the modern construction undertaken at the farm in the 20th century.

67. I note that the Council's Conservation Officer agreed that building recording would be appropriate mitigation for its loss and that further mitigation relating to the potential archaeological remains would be secured via a condition for a written scheme of investigation for the whole site. Consequently, I am satisfied that preservation through recording would be appropriate given the limited and equivocal significance of these assets.

Ecology

68. In its fourth putative reason for refusal, the Council highlighted concerns regarding the effectiveness of mitigation measures relating to adverse effects on the integrity of the Upper Nene Gravel Pits Special Protection Area (SPA) and Ramsar site. It was also not satisfied that the proposed mitigation would overcome adverse impacts on protected species. It chose not to defend this reason at the Inquiry. STAUNCH raises additional concerns regarding the baseline surveys, protected hedgerows, Biodiversity Net Gain (BNG), Titchmarsh Meadow Site of Special Scientific Interest (SSSI) and skylark mitigation.

Baseline Surveys

69. STAUNCH has significant concerns relating to the adequacy and competence of the surveys that have been carried out as well as their age. As I address the protected species surveys in subsequent sections, I will just focus on the winter bird surveys of the Functionally Linked Land (FLL) and the age of the baseline at this particular point.

70. The winter bird surveys were undertaken over two separate winter periods in 2020/21 and 2021/2022, as is apparent from the results in the appendices of the ES addendum[20]. These were undertaken between November and March in both instances with the survey methodology being broadly based on British Trust for Ornithology territory mapping approach and carried out by an experienced, ornithological surveyor.

71. STAUNCH points out that the local guidelines for assessing FLL state that surveys should include adjacent fields and take place between September to March[18]. This is because golden plover overwintering in Northamptonshire typically arrive mid-September and return to their breeding grounds at the end of April. It also points out that trial trenching affected the results due to disturbance and that the area of assessment changed. The appellant's witness conceded that this affected the site for one month during the survey period.

72. Although clearly not conforming to local guidelines, STAUNCH notes that it nevertheless recorded that qualifying species were above the 1% threshold. However, the inadequacy of the survey meant that an erroneous conclusion concerning likely significant effects infected the shadow Habitats Regulations Assessment (HRA) that could only be addressed through the use of casual records. Be that as it may, this failure does not alter the fact that the proposal now needs to be subject to a HRA and that further data is available to assist my decision making. The point about the inadequacy of the winter bird surveys goes nowhere as a consequence.

73. Turning to the age of the surveys, STAUNCH points out that they are now four years old and that this contrary to best practice which states that after three years ecological reports are unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated[19]. The initial ecological surveys, associated with the ES, were completed in 2021 and comprise a series of survey reports on bats, great crested newts, reptiles, breeding birds and wintering birds[20]. A further wintering bird survey was undertaken in the winter of 2021/2022 and submitted as an ES addendum[21].

74. The appellant highlights the fact that the scope of subsequent updates was agreed with Place Services at a site meeting on the July 2023. This included a walkover survey on 28 July 2023 and further bat surveys that were completed on 1st and 7th August 2023[22]. Dormouse surveys were completed between August and October 2023[23]. Additional surveys were also conducted during February and June 2025, as well as a further walkover survey in June 2025[24].

75. Given the above, I find the assertion that all of the surveys are out of date to be unfounded. Whilst not repeated, they have nevertheless been updated in accordance with the wishes of the Council. In the final assessment of the Site, which occurred this year, the appellant notes that additional surveys were not considered to be proportionate to the potential for impacts likely to occur and that the potential for significant impacts remained as assessed in the ES[25]. I note that the management of the Site has also remained unchanged since the publication of the ES, adding further weight to the conclusion that the underlying baseline has not significantly changed despite a small number of additional species having been identified by STAUNCH.

Protected Hedgerows

[18] CD 7.18
[19] CD 10.4.4.17
[20] CD 1.3.8.2, 1.3.8.3, 1.3.8.4, 1.3.8.5 and 1.3.8.6
[21] CD 1.3.17
[22] CD 1.3.31
[23] CD 1.3.32
[24] Paragraphs 5.2-5.5, CD 10.1.4
[25] Appendix B, CD 10.1.4.1

76. As already stated, a hedgerow is deemed to be important if it has been present at a location for 30 years or more and satisfies at least one of the criteria listed in Schedule 1, Part II of the Hedgerow Regulations 1997 (as amended). These criteria relate to either archaeology and history or wildlife and landscape. I shall only focus on the latter. For the avoidance of doubt, I identify hedgerows according to the classification in Figure 2 of a Phase 1 Habitat Survey Report[26].

77. STAUNCH maintains that criteria 6(a) and 7(1)(d) of the regulations apply. Criterion 6(a) identifies a hedgerow as being important if contains species listed or categorised as mentioned in sub-paragraph (3). This includes birds that are protected by special penalties that are listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). It also includes birds categorised as a declining breeder (category 3) in "Red Data Birds in Britain" Batten LA, Bibby CJ, Clement P, Elliott GD and Porter RF (Eds.). Criterion 7(1)(d) identifies a hedgerow as being important on the basis of at least 5 woody species being present and associated with it at least 4 of the features specified in sub-paragraph (4). The number and type of woody species that are present is ascertained in accordance with sub-paragraph (3). This requires the enumeration of 30 m lengths with numerical adjustment according to the overall length of the individual hedgerow that is being considered.

78. In relation to criterion 6(3)(a), I accept that one such species is present and note that it had successfully bred at the time of the Inquiry in a tree associated with one of the hedgerows that would be removed. However, this species is highly mobile in its choice of nest site from one year to the next, because of the biennial, or even annual, nature of many of the nests it utilises. This is evident from the fact that it has not persistently nested in one location on the Site. As such, it cannot be used to reliably indicate the presence of an important hedgerow due to its transitory usage which varies between years.

79. In relation to 6(3)(b), STAUNCH views the Joint Nature Conservation Committee (JNCC) Red Data Books as having been superseded by *Birds of Conservation Concern 5 (2021)* and notes the presence of red-listed linnet, yellowhammer and house sparrow, which were identified as probable and possible breeders in the appellant's own breeding bird surveys. It maintains that this would make H18 an important hedgerow under this criterion. However, I find the assertion unfounded as there is nothing in the introductory paragraph of this publication to show that this is the case, as suggested in response to one of my questions. Whilst it is a recognised conservation designation which clearly identifies a decline of these species, I do not have any evidence before me that it has formally replaced the JNCC Red Data Books. Even if this were the case, the legislation points to a particular, albeit out of date, publication and has not been amended. Strictly, under the terms of this legislation, H18 cannot therefore be identified as an important hedgerow under criterion 6(3)(b). That said, the loss of breeding habitat for these declining species would clearly be an adverse effect requiring mitigation.

80. In relation to criterion 7(1)(d), the witness for STAUNCH confirmed that no assessment had been carried out in accordance with 7(3) and that its assertions were opinion based. In contrast, I note that the hedgerows were surveyed individually by the appellant using the Hedgerow Evaluation and Grading System (HEGS) and that they were also assessed against the wildlife and landscape

[26] Appendix 7.1 of the ES, CD 1.3.8.1

criteria of the regulations[27]. These results demonstrate that none of the hedgerows qualify in relation to this criterion although I note the fact that the survey failed to identify the presence of elm, wild privet and Midland hawthorn. Whilst this may have undermined the assessment to a certain degree, I have no alternative assessment before me to the contrary, just opinion-based evidence.

81. Overall, I do not find that there is reliable evidence to conclude that any specific hedgerow consistently qualifies as an important hedgerow against the wildlife and landscape criteria even though, with the exception of H3 and H10, the hedgerows qualify as Habitats of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006 (as amended)(the NERC Act).

82. STAUNCH observes that the HEGS shows that a number of hedgerows are classified as High and it opines that this indicates the presence of 'Very High Distinctiveness Hedgerows' according to unspecified BNG calculation guidance. However, this is again, opinion-based evidence lacking any substantiated basis given the fact that it is unsupported by any systematic field survey. Moreover, I note that 12 out of 24 hedgerows were either low or moderate and that the remaining hedgerows were moderately high to high. None of the hedgerows were of the highest ecological quality according to this classification nor is there any evidence before me which specifically translates the attained gradings into particular BNG categories.

Protected Species

83. STAUNCH highlights some concerns in relation to bats and dormice. In relation to bats, this relates to the evaluation of potential bat roosts in trees and at Manor Farm, the suitability of the commuting and foraging habitat and the effect of the proposal on Barbastelle bats. In relation to dormice, this relates to the placement of nest tubes.

84. The Bat Conservation Trust guidelines (BCT Guidelines) state that tree surveys for potential roosting features should be preferably carried out during winter months when the leaves are not on the trees[28]. It goes on to recognise that some surveys are nevertheless carried out in the summer months. The appellant's ecology witness stated, in response to one of my questions, that the limited height and generally open canopies of the affected trees were such that the leaves did not significantly obscure views. Having observed some of these trees during my site visit, I concur. I also note that the trees that were identified as having significant potential for a bat roost were subject to ariel inspection and that any features potentially supporting roosts were subject to closer inspection. This included the use of an endoscope, mirror and torch to determine physical presence as well as observations to determine the presence of droppings, urine staining and mammalian oil staining. In my experience, it can also be possible to see these last two indicators from ground level. As such, I do not find the assessment of potential roosting features lacking just because the survey was carried out during summer months. Nor do I find it out of date given the time it takes for potential roosting features to form in trees.

85. Turning to Manor Farm, the appellant acknowledges that it was not possible to enter its curtilage or conduct an internal survey. However, the open nature of the

[27] CD 1.3.8.1
[28] CD 10.4.4.11, page 46

site and habitats within it enabled the surveyors to view potential commuting routes to/from the building which confirmed that bats were not roosting within the buildings. This comprised a dusk emergence survey undertaken 15 minutes before sunset until 90 minutes after and a dawn re-entry survey undertaken 90 minutes before sunrise and 15 minutes after. Visual observations were supported with full-spectrum, sonogram recordings[29]. In response to one of my questions, the appellant's ecology witness indicated that the buildings would not be suitable for winter roosting due to the need for constant temperatures while bats are hibernating. As such, I find the assessment to be robust. Although Manor Farm was re-surveyed in 2023, STAUNCH maintain that this did not include the barn on the basis that the building was not specifically identified[30]. However, the range of bat detectors is such that individuals leaving and entering that building would have been recorded and therefore observed.

86. Turning to the suitability of the Site, the BCT Guidelines state that an indicator of high suitability is "*continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats*" with hedgerows being identified as one of the supporting landscape features. When this is the case, then up to two surveys per month are recommended between April and October. The appellant has not undertaken these surveys on the basis that a lack of connectivity means that only a low suitability is present.

87. I note that the all the hedgerows on a north-south axis that would be removed are either gappy or go nowhere in terms of connectance to wider landscape features suitable for bat commuting and foraging. Although there is an east-west connection from the triangular woodland, this only connects to the exposed, roadside hedgerow along Islington as opposed to the hedgerow to the east of the woodland which connects to Polopit Brook which is a more suitable commuting and foraging route given its topography and presence of riparian vegetation. Overall, I do not find the Site to be well connected and therefore find the survey effort to be appropriate and proportionate.

88. Turning to the effect of the proposal on Barbastelle bats. STAUNCH stresses the importance of this species and its conservation status. It states that no mitigation has been proposed that would prevent significant impacts on either this species or the other species that have been recorded on the Site. The appellant points out that the bat assemblage is not considered to be significant or exceptional and of no more than local value, even with the presence of the Annex II Barbastelle bats[31].

89. Although STAUNCH draw comparisons with bat surveys undertaken at Eversden and Wimpole Woods, over a greater number of days at a similar time of year, local climatic conditions would have varied which may have affected the recorded activity. I also have no indication of whether the sampling intensity was the same in terms of the number of static detectors nor whether the same detectors were in fact used. As such, I cannot be sure that it was the same in all respects and that any valid comparisons can be drawn from which the value of the appeal site can be inferred.

90. In terms of bat mitigation, the appellant points out that the proposals would include the creation of potential foraging habitat within the Site that would lead to an overall

[29] CD 1.3.8.2
[30] CD 1.3.31
[31] CD 10.1.4

improvement. This would include the provision of additional habitats such as woodland, scrub, ponds and species-rich grasslands that would increase the availability of invertebrate prey and be of greater value than the intensively managed agricultural habitats that currently predominate. The appellant highlights the fact that the landscape bund would be planted with woodland and scrub grading into flower rich grassland that would be of particular benefit in terms of providing an optimal foraging resource. I also note that this area would provide a substantially more robust connection on an east-west axis in comparison to the existing hedgerow. Whilst there would clearly be short term disruption to foraging and commuting routes, there would be an overall improvement in the longer term. I therefore find the assertion that no suitable mitigation is present to be unfounded and do not find the proposed mitigation lacking.

91. Turning to the adequacy of the dormouse survey, the guidance states that at least 50 tubes should be used to sample a site, spaced at about 20 m intervals[32]. The survey report indicates that 102 tubes were installed in July 2023 with inspection surveys being completed on 29 August, 20 September and the 17 October. It observes that suitable dormouse habitat was limited within the Site but acknowledges that hedges and localised scrub, mature trees and woodland edge were present which could provide commuting and nesting opportunities. The Council's consultee, Place Services, observed that the placement was at 20 m where suitable habitat was present[33]. Consequently, the 100 m spacing occurred where habitat was less suitable for this species.

92. In this respect, I note that the guidance identifies the best hedges has having a high diversity of woody species, no gaps, continuity of food resources throughout the year and that regular cutting 'drastically reduces' the availability of flowers and fruits that may be borne on new wood. The regular cutting means that the presence of a viable population is unlikely even in more suitable sections on the Site. I also note that there are no records of this species having previously occurred on the Site and I have no information before me concerning the location of the nearest population. Under the circumstances I find the survey effort to be proportionate despite not strictly following the recommended guidance.

BNG

93. STAUNCH maintain that the calculation of a 22% net gain is flawed and that this is due to the omission and misclassification of some of the baseline habitats. No alternative assessment was submitted to the Inquiry. In response to one of my questions, STAUNCH stated that there would be no net gain. As the proposal was submitted prior to the requirement for mandatory net gain, the calculations are illustrative rather than definitive in this instance, even though I asked for them to be updated. As such, the key question to be resolved is not the precise quanta of net gain and whether the calculation is correct but rather, whether there would be an overall net gain.

94. The appellant points out that the proposed mitigation would comprise native tree and shrub planting which would include provision for semi-mature trees and new hedgerows, as well as wildflower grasslands and aquatic habitat associated with the SUDS area. The proposals would incorporate a significant area of woodland,

[32] CD 10.4.4.7
[33] CD 10.1.4, paragraph 5.38

woodland edge and scrub planting that can grade into areas of grassland. The inclusion of small embayment's or glades on the periphery, along with the variation in aspect and gradient provided by the bund, would further serve to increase topographic variation increasing the availability of differing microclimates and available niches for wildlife.

95. A dedicated 'biodiversity area' would also be present that could provide a mosaic of habitats, including areas of open grassland, wetland and scrub. The appellant points out that Place Services has suggested that this area could focus on the provision of open grassland habitat to benefit wildlife including skylark, small heath butterfly and over-wintering birds[34]. The landscape concept plan shows the indicative layout of these measures which would be subject to more detailed design and approval at the appropriate stage[35]. Added to this would be the biodiversity benefits associated with the FLL mitigation which would cover an area of 44 ha immediately to the north of the Site.

96. These benefits are balanced against the loss of all internal hedgerows and the partial loss of some sections of boundary hedgerow to facilitate access, a loss of suitable skylark nesting habitat, the loss of FLL for golden plover and lapwing as well as the loss of open, early successional habitat associated with the remediated land. Although the new habitat creation and management of the land immediately to the north of the site for golden plover and lapwing, in large part, would mitigate the losses that would occur, I nevertheless find that there would be an overall net gain bearing in mind the extent and nature of the measures that have been proposed and the fact that the majority of the Site is currently intensively managed, arable land.

Titchmarsh Meadows SSSI

97. STAUNCH highlight concerns relating to potential adverse effects on this site that might arise from groundwater and surface water pollution as well as changes to water level through the de-watering process that would occur on the Site.

98. The SSSI lies around 1 km to the north-east of the Site and is considered to be hydrologically linked via a drain. It is a small, poorly drained field lying alongside a stream and incorporating a medieval fishpond. Much of the site comprises base rich marsh communities of high botanical interest with calcareous clay and loam pasture on the drier areas. The notified interest is associated with these plant communities and their constituent species.

99. In terms of groundwater connectivity, my attention was drawn to a de-watering assessment which evaluated potential impacts on Titchmarsh Castle Moated Site and Fishponds scheduled monument which is near the SSSI. This indicates that the groundwater in the underlying geological formation generally flows west to east and slightly south, south-east. As such, the groundwater at Titchmarsh is controlled by recharge from higher ground to west, rather than the Site[36].

100. Turning to surface water flows, the appellant notes that the overall volume of discharge is anticipated to remain the same post-development with the rates likely to be more constant with less extremes. It maintains that this would not

[34] CD 10.1.4, paragraph 6.41
[35] CD 1.2.8
[36] CD 1.3.36

significantly impact Titchmarsh Meadows SSSI due to the small changes in the rate of discharge together with the distance from the site which would moderate the significance of any such changes. It is also considered that a reduction in water quality of surface run-off is unlikely due to the implementation of appropriate measures within the SUDS proposals[37].

101. I note that construction phase impacts arising from changes to the volume and quality of water that might be discharged into the drain are capable of being controlled by appropriate conditions and that specific wording to control the impact of diesel spillage during the operational phase has also been suggested. As such, I find that the proposal would not harm the special scientific interest of this site.

Habitat Regulations Assessment

102. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended) (the Regulations) requires me to undertake an appropriate assessment of the implications of the plan or project for the SPA in view of its conservation objectives. Whilst the Ramsar site does not have formal conservation objectives, this is not the case for the overlapping SPA. The qualifying bird species of the SPA have a high degree of commonality and therefore its objectives are also relevant to securing the favourable conservation status of the Ramsar bird assemblage.

103. Paragraph 194 of the Framework states that Ramsar sites should be given the same protection as Habitats Sites (European sites), which include SPAs. Government guidance states that any proposals with potential to affect a Ramsar site, either alone or in combination with other plans or projects, require a HRA[38]. The provisions of this assessment are set out in Regulation 63-64 of the Regulations.

Screening

104. The Site is within a defined consultation zone of a European site and a Ramsar site:

- The Upper Nene Gravel Pits SPA is located approximately 1.2 km to the north west of the appeal site at its nearest point. It is a discontinuous area of disused gravel pits which extends approximately 35 km and covers an area of approximately 1,358 ha. It is underpinned by two SSSIs comprising Aldwincle Marsh and Upper Nene Gravel Pits. The qualifying features for the SPA are bittern, golden plover and gadwall. Additionally, it also has an internationally important assemblage of birds which includes lapwing. The extensive open waters and associated habitats collectively form one of the most important inland localities in England for waterbirds in the non-breeding period and regularly supports peak numbers of waterbirds in excess of 20,000 individuals, including significant populations of bittern, golden plover and gadwall.

- The Upper Nene Gravel Pits Ramsar overlaps with the SPA and is underpinned by the same SSSIs. The criterion features for which it qualifies

[37] CD 1.3.8, paragraph 7.8.3
[38] Habitats Regulations Assessments: Protecting a European Site, Department for Environment, Food & Rural Affairs, 6 December 2023.

are 5 and 6 because it regularly supports more than 20,000 waterbirds in the non-breeding season as well as 1% of the European mute swan and gadwall population. The range of habitats and varied topography of the lagoons provide valuable resting and feeding conditions for wintering waterbirds, especially ducks and waders including golden plover and lapwing. Noteworthy fauna includes golden plover which accounted for 2.3% of the national population at the time the site was first designated.

105. The conservation objectives for the SPA are to ensure that the integrity of the site is maintained or restored as appropriate and to ensure that it contributes to achieving the favourable conservation status of its qualifying features by, among other things, maintaining or restoring the extent and distribution of the habitats of the qualifying features and the population of each of the qualifying features.

106. The Site Improvement Plan identifies planning permissions as a general threat to the SPA and recommends the development of an SPD for the site. This identifies a number of more specific threats which include poorly located or designed development with potential to lead to the loss of supporting habitat and changes in water quality that could render the habitat unsuitable for waterbirds[39]. As there were no other credible threats, the likely impacts of these effects are screened as follows:

- Upper Nene Gravel Pits SPA – There is a likely impact pathway given the loss of FLL but not from changes in water quality due to the fact that foul water disposal would be within a different hydrological catchment served by the Raunds Water Recycling Centre, located approximately 4 miles to the south of the Site. Therefore, the only credible impact relates to the FLL.

- Upper Nene Gravel Pits Ramsar Site – There is a likely impact pathway given the loss of FLL but not from changes in water quality due to the fact that foul water disposal would be within a different hydrological catchment served by the Raunds Water Recycling Centre, located approximately 4 miles to the south of the Site. Therefore, the only credible impact relates to the FLL.

107. FLL is supporting habitat beyond the boundary of a European site that is connected to the life and reproduction of a population for which a site has been designated or classified. Land that is used on a regular basis by significant numbers of individuals will be important to the continuing survival, reproduction and viability of the species population associated with the designated site.

108. The screening suggests that likely significant effects would be present in relation to the SPA and Ramsar site and I conclude that the loss of FLL is a credible impact pathway with the potential to have a likely significant effect alone. As such, there is no-need to consider in-combination effects at this stage.

Appropriate Assessment

109. Although initial desk-based assessment and field surveys suggested that the Site was not functionally linked, additional records were submitted to the Northamptonshire Biological Records Centre (BRC) which led Natural England (NE) to conclude that the Site is functionally linked to the SPA and that an adverse

[39] ID22

effect on integrity could not be ruled out[40]. These records show varying numbers, of up to 200 golden plovers, using the Site between 2021 and 2025[41]. The distribution of the records shows that the central and northwestern parts of the Site were favoured and that more than 1% of the estimated population were regularly present. Given the unsuitable nature of the previously worked area and distribution of these records, approximately 60 ha of FLL would be lost.

110. Bearing this in mind and given the conservation objectives and supplementary advice for the site, I cannot rule out, beyond all reasonable scientific doubt, that the proposal would not lead to an adverse effect on the integrity of the SPA and Ramsar site either alone or in-combination with other plans or projects.

Mitigation

111. I now turn to whether the adverse effects could be mitigated to ensure that any such effects are reduced to an acceptable level and whether the mitigation measures have been secured with the necessary degree of certainty. The mitigation land would cover an area of approximately 44 ha and would be situated immediately north of the Site. It comprises intensively managed arable land with narrow field margins and an approximate field size of between 11 ha and 23 ha.

112. The proposed mitigation would maintain cereal production with specified break crops which would include oats, beans, linseed, sugar beet with overwintering stubble and herbal leys. It would require the incorporation of green manure and organic matter as well as other measures, such as manure spreading, to increase soil organic matter for the benefit of soil invertebrates. Invertebrate abundance would be further enhanced through the creation of beetle banks. Together, these measures would significantly increase the availability of food for the waders in comparison to the current intensive farming methods. Consideration of 'no-till' or 'minimum till' agricultural practices would occur, subject to practicability. The planting of oil-seed rape and any other unspecified non-cereal crops would be avoided, as would over-wintered, cereal stubbles. Disturbance from dogs using footpaths to the south and north of the mitigation area would be controlled by suitable fencing. Annual reporting and monitoring would support adaptive management practices for a period of 80 years.

113. This mitigation was shaped following engagement with NE through its Discretionary Advice Service, where the necessary criteria were set out, which led NE to conclude that it was satisfied that the proposed mitigation would be adequate for golden plover and lapwing which, at that time, covered a smaller area of 22 ha[42]. The Council also concluded that this provided the necessary degree of certainty to rule out an adverse effect on integrity alone in its HRA[43]. The suggestion by STAUNCH that it did not consider the mitigation scheme properly is unsubstantiated and I see no reason why the NE advice should not carry significant weight, as established by the Courts[44]. Furthermore, I have consulted NE over the final version of the scheme and its views remain unchanged. Nevertheless, STAUNCH still questions the suitability of the mitigation land and takes issue with

[40] CD 10.4.4.14, email dated 21 May 2024
[41] CD 10.4.4.12
[42] CD 9.7
[43] Paragraph 4.1.15, CD 9.31
[44] Smyth v Secretary of State for Communities and Local Government [2015] EWCA Civ 174

the lack of existing records, field size, topography, pylons and construction disturbance.

114. Firstly, the lack of records does not mean that golden plover and lapwing have not used this land, merely that they have not been observed. STAUNCHs witness acknowledged, in response to one of my questions, that the casual BRC data that it relied upon had not been subject to any correction for recorder effort and did not comprise any nocturnal observations. I find it reasonable to assume that there would have been a greater focus on the Site and a concomitant recording bias, in comparison with any adjacent land, over the extended period between the application first being made and the appeal. I also note that 15 golden plover were observed on the western part of the mitigation area in 2025, as shown in its own evidence[45]. Even if this record turns out to be in the Site, as suggested by STAUNCH in closing, I see no prerequisite requirement for mitigation areas to already be in use by this species in the advice of NE. Indeed, it would not constitute mitigation if such land were already functionally linked unless the mitigation was seeking to increase the carrying capacity of land that was linked already which was not the case.

115. Turning to the size of the two smaller fields, I note that they are both in accordance with NE guidance because they are not under 10 ha in size. Whilst close to this threshold, NE clearly found this was not an issue when it approved the previous mitigation scheme and the defined, evidence-based threshold is clearly passed in this instance. Furthermore, I observe from STAUNCHs own evidence that more than 200 golden plover were observed on two separate occasions in an adjacent field, of a similar size, immediately to the east[46].

116. I did not find the topography of the mitigation area to be significantly different to the areas where golden plover have been recorded on the site. Whilst it is suggested that they prefer more level ground this was not substantiated through any peer-reviewed evidence or the use of habitat suitability modelling, as the witness confirmed in response to one of my questions.

117. It was also suggested that a pylon and overhead wires, as well as the proposed bund vegetation, would lead to predator perches that would affect the suitability of the mitigation area. The appellant's ecology witness confirmed that the two main avian predators in this situation were likely to be peregrine falcon and sparrowhawk. Whilst these species have very different hunting styles, neither are likely to take individuals from the ground once a flock has settled. There is consequently only a limited window of opportunity where individuals might be taken and therefore disturbed through avian predation.

118. I also note that there are numerous records of golden plover stretching across the FLL towards the SPA that are either underneath or near the power lines and pylons, as well as the fact that the transmission system runs across the SPA itself. I acknowledge that NE has made a tentative point about powerlines as being a 'problematic feature' in relation to the IM development[47]. However, this was in combination with a range of other factors and is also not supported by what has actually been observed in terms of the distribution of this species.

[45] CD 10.4.4.13
[46] CD 10.4.4.12
[47] ID60

119. Turning to the potential for disturbance during the construction phase, I accept that this could occur and habituation to this disturbance would not necessarily occur. However, this would be a temporary effect and both golden plover and lapwing are highly mobile species which are able to rely upon an extensive area of FLL in this particular instance[48].

120. In terms of disturbance during the operational phase, the bund would reflect acoustic disturbance which would also be controlled by condition. Moreover, the buildings and associated yards would be well away from the majority of the mitigation land and this would be hundreds of metres in most instances. A lighting strategy is also subject to a condition that must minimise spillage and have particular regard for roosting and foraging areas within the FLL mitigation area. Bearing in mind the height of the buildings, the topography of the FLL and separation distances, I also do not find that there would be any significant overshadowing of the FLL, even during the winter months.

121. None of the above, nor any other points that STAUNCH raises, gives me cogent reasons to depart from the advice of NE and it is also my professional judgement that the proposed mitigation would clearly improve the food sources for golden plover and lapwing and reduce potential disturbance from dog walkers. There is also an ongoing feedback mechanism whereby management can be adapted to meet changing circumstances on the basis of the observed numbers which requires ongoing reporting to the LPA. This is secured via a section 106 planning obligation (s106) which gives me sufficient certainty that the measures would be effective as it binds future landowners as a land charge which can be enforced against.

122. STAUNCH has made much of a previous Inspector's decision at Wood Lodge Farm and maintains that I must take the same approach in this case[49]. However, it is not the same in all respects given that the presence of FLL was disputed, there was no mitigation strategy secured via a s106 and only a Grampian condition for land which was managed for equestrian use, in small parcels and crossed by a PRoW. The current proposal has been assessed according to its individual merits and a significantly different factual matrix. I therefore give this decision little weight.

123. STAUNCH also maintains that imperative reasons of overriding public interest apply in this instance and that the Council's HRA was flawed for not considering in-combination effects. However, these assertions are predicated on the assumption that the mitigation would not be effective which is contrary to my own findings and the views of NE. Furthermore, where an adverse effect alone is mitigated, there can be no in-combination effects with other plans or projects and there is consequently no need to consider imperative reasons or alternative solutions.

124. Given the above, I am satisfied that the mitigation measures are appropriately secured and are sufficient to rule out adverse effects on the integrity of the SPA and Ramsar site beyond all reasonable scientific doubt. There would be no residual effects arising from the scheme that would be capable of adding to any in-combination effects from other schemes. The effect alone would be mitigated. This would maintain the integrity of Ramsar site and SPA. I am also satisfied that the notified features of the component SSSIs would be preserved given my

[48] CD 1.3.34
[49] ID1, APP/M2840/W/24/3354297

obligations under s28G(2) of the Wildlife and Countryside Act 1981 (as amended). The proposed development would not consequently conflict with Policy 4 of the JCS.

Locational Sustainability

125. Policy 24c of the JCS states that logistics proposals should have good access to a local labour supply and be accessible to the local workforce through public transport, walking and cycling. Policy 23b of the JCS supports employment growth which is in Sustainable Urban Extensions (SUE) or strategic sites in order to balance housing and jobs growth and encourage more sustainable patterns of development which is also the principal aim of Policy 11 of the JCS and Policy EN1 of the LP. Paragraph 110 of the Framework requires significant development to be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 118 also requires a travel plan for all proposals that generate a significant amount of vehicle movement. The Council and STAUNCH do not consider that the proposals would comply with this limb given the absence of a significant local workforce and the limited accessibility of the site by means other than private car.

Labour Supply

126. STAUNCH points out that Thrapston has a low number of people who are unemployed and that this stood at around 117 according to the 2021 census. It also points out that Thrapston cannot provide a labour pool for this scale of development and I agree. Instead, the appellant relies upon that fact that a significant proportion of the population is within a 25-minute drive. More specifically, it notes the undisputed fact that around 393,473 of the working-age population are within this drive time and that this is the average home-to-work travel time for the local authority area[50]. It also points out that this labour supply would increase with the construction of new homes at a number of committed SUE.

127. The Council draws my attention to an alternative approach to defining the labour market which considers access by sustainable means alongside labour supply and levels of unemployment [51]. It maintains that the score is 'middling' at best and that this is influenced by market preferences for the A14 corridor in the context of existing stock and commitments. Nevertheless, this study ranks Thrapston fourth out of eleven locations in terms of its growth location recommendation and notes that it has potential for secondary logistics growth if development proposals can demonstrate contributions to mitigate and improve road network issues[52].

128. The Council points out that Thrapston is a Market Town rather than a Growth Town and that the latter generally have ready access to labour markets, a range of skilled workers and existing unemployed workers. The Council views such towns as better locations to co-locate housing and employment growth because this represents the most sustainable approach to development which prevents urban sprawl and reduces commuting times.

129. The appellant points out that there is poor self-containment within the County with a rate of just 49%, which means that 51% of residents travel outside of the local

[50] Paragraph 6.3.3, CD 10.1.2
[51] North Northamptonshire Strategic Logistics Study 2024, CD 7.13,
[52] Table 7.1, CD 7.13

authority area for work purposes[53]. A further study also suggests that 54% of Thrapston residents commute for 30 minutes[54]. The appellant suggests that the proposal would improve self-containment rates and reduce commuting times whilst also noting that the Growth Towns would be within the 25-minute drive time.

130. Although both the 25-minute and 30-minute catchments stretch beyond North Northamptonshire, evidence suggests that a significant number of 'competitor workers' i.e. workers with similar jobs, would have a shorter commuting time to the proposed development from within the District[55]. The 2022 study goes on to note that there were 40,000 homes in the housing pipeline within 30 minutes and that this would potentially provide an additional 8,100 workers for the transportation and storage sector. Although this relies on out-commuting from other areas, as highlighted in the Council's closing, there would be clear scope to reduce commuting times given the SUEs that are planned as well as the composition of the local labour force.

131. Whilst I accept that there would be a larger pool of local employees for development in and around Growth Towns, I do not consider a 25-minute car journey to be an excessive commuting time or represent a poor level of accessibility to the wider labour market. This is against a backdrop of poor self-containment within the County, as the appellant points out.

132. As such, there would be some potential re-balancing of the wider labour market and a reduction in the length of journeys that are undertaken. This could consequently limit the need to travel and lead to more sustainable patterns of commuting overall.

133. Whilst I recognise this benefit, the labour supply cannot be considered local in policy terms given that conformity with this policy requires development to accord with the spatial strategy which means that it should draw on local labour markets associated with Growth Towns rather than a wider population within a fixed travel time. It would also not focus employment growth in areas where new housing is planned, as directed by the spatial strategy. As such it would fail to balance the provision of new housing alongside jobs.

134. Given the above, the proposal would conflict with Policies 11, 23b and 24c of the JCS and Policy EN1 of the LP but not paragraph 110 of the Framework because of the potential for the proposal to reduce out-commuting which would consequently limit the need to travel.

Alternative Transport Modes

135. The Council acknowledges that there would be improvements to a footway and cycleways in the vicinity of the Site, as listed in the relevant report[56]. Whilst it accepts that these proposals would help ensure access to the development for non-car users, it maintains that they do not address the fundamental issue that the location of the site is remote from sources of labour[57]. STAUNCH has concerns relating to the effectiveness of the Travel Plan as well as the safety of pedestrians and cyclists. This would be in relation to the lack of connecting walkways in the

[53] Paragraph 2.5.3, CD 10.1.2
[54] CD 1.1.16
[55] CD 1.1.16
[56] CD 1.3.28
[57] Paragraph 5.68, CD 10.2.1

road service area, a lack of a signalised pedestrian crossing on the A605, south of the Huntingdon Road roundabout, and the fact that the proposed cycle lane would require cyclists to dismount in order to cross the A605. It also suggests that the bus service would not be sustainable if 5% of employees switch to public transport which it equates to around 125 people, according to STAUNCH.

136. The evidence suggests that the scheme would be walkable and cyclable from Thrapston and would be connected to a larger workforce in Kettering, Wellingborough and Raunds by a bus service for 10 years with every new worker being able to avail themselves of free use of that service for 6 months, as secured through the s106. I agree that the use of a bus service is not to be judged solely on whether the trip would be quicker in a car. This is because other factors will influence choices such as convictions about sustainable transport and the affordability of a car for commuting purposes as opposed to the use of a bus.

137. Turning to the Travel Plan, STAUNCH estimates staff of around 2,500 and questions the anticipated levels of homeworking (~125 staff), use of the bus service (~125 staff) and the numbers likely to walk or cycle (~250 staff)[58]. I note that this is higher than the estimated figure of 1,800 jobs in the appellant's planning evidence[59]. I see no reason why a proportion of the office-based jobs would not have a homeworking element given that this has become an established employment practice. The original comments regarding the bus service were made prior to the s106 provision which would have regard to the shift patterns. The characterisation of this service as not being sustainable because of just having 125 passengers is overly simplistic[60]. This is because other passengers would clearly use the service and contribute to its viability. I also note that the potential for the early cancellation of this service is also no longer part of the s106. The service is consequently secured for 10 years with significant initial incentivisation which has a clear potential to establish the necessary patterns of behaviour.

138. Doubts about the proportion of individuals likely to either cycle or walk relate to the attractiveness of these options and associated road safety concerns. I accept that the levels of traffic on the local road network, as well as the frequency of HGVs, are such that cycling is only likely to be undertaken by experienced cyclists. I note the concerns in relation to the need to cross the A605. However, the general arrangement plan shows the retention of the lane splitters at the existing crossing points which would continue to provide adequate refugia for pedestrians and cyclists travelling between the Site and Thrapston[61]. I also observed that there are good sightlines from these crossing points along the Huntingdon Road and the A605. Furthermore, the size of the roundabout is such that there are also clear views of traffic leaving the roundabout from the lane splitters.

139. In terms of road safety, I note the summary of personal injury collisions for this junction shows that there have been no collisions involving non-motorised users over a five-year period and that the collisions involving motor vehicles have only classified as slight[62]. Although an unspecified incident with a cyclist in August 2023 has been highlighted by STAUNCH, I have no evidence of persistent issues

[58] CD 10.4.2.14
[59] CD 10.1.1, paragraph 5.16
[60] Paragraph 69, CD 10.4.2
[61] LWL/701/021 Rev D5, CD 1.3.4.1
[62] Table 2.1, CD 1.3.28

concerning the safety of non-motorised users at this junction[63]. Neither do I have evidence that a lack of connecting walkways in the road service area poses a risk to pedestrians who clearly access this area on a regular basis given the desire line that is present along the grass verge.

140. Given the above, I find that proposed development would be accessible to the, albeit limited, local workforce through public transport, walking and cycling and that there would be a genuine choice of transport modes.

Logistics Need

141. There is no dispute that there is an unmet need for logistics which the proposed development would partly address. I have detailed expert evidence before me from three different witnesses suggesting the current need is somewhere between 400-600 ha. None of this evidence is challenged by the Council and its own evidence base suggests an unmet need of at least 107 ha[64]. In closing, the Council suggests that the range of values and different methodologies is such that there can be little confidence in the veracity any single approach or associated level of need.

142. STAUNCH accepts that there is an unmet need but maintains that there is a sufficient supply within the current plan period and that the suitability of sites is best considered through the examination of the emerging local plan. Despite the fact that the local plan is at an early stage, it claims that the scale of the proposed development is such that prematurity would result. It only questions the needs assessment of the appellant and the associated 'suppressed demand' methodology.

143. It also maintains that there are alternative, 'less sensitive' sites along the A14 corridor and that there is an existing supply of 323–337 ha of Class B8 land in North Northamptonshire, according to Savills' own assessment[65]. In particular, it notes that this shows a pipeline of 7 units in the 30,000 m^2 - 40,000 m^2 range, which equates to a 3.5-year supply and 2 units in the 40,000 m^2 – 50,000 m^2 range, which equates to a 2-year supply. It also draws my attention to the opinions of Avison Young which identifies a 6-year supply[66], as well as the fact that the recent review of the East Northamptonshire Local Plan Part 2 concluded that there was no need for any additional B8 sites to be allocated[67].

144. The emerging plan is at an early stage and the Council agrees that it can only be afforded very limited weight. It notes that the latest Local Development Scheme was agreed in March 2025 and that a draft plan will most likely be published for consultation at the beginning of 2026, with adoption not expected until the end of 2027[68]. Paragraph 50 of the Framework sets out the limited circumstances in which prematurity can apply and this clearly establishes that a plan must be at an advanced stage. Paragraph 51 goes on to state that prematurity will seldom be justified where a draft plan has not been submitted for examination. As such, I find prematurity to be unarguable at the present time. I also find that deferring decisions so that potential sites can be considered through the local plan

[63] CD 10.4.2.14
[64] North Northamptonshire Strategic Logistics Study 2024, CD 7.14
[65] Table 5.6, CD 1.1.14
[66] CD 10.4.5.3
[67] CD 9.10
[68] Paragraph 4.29, CD 10.2.1

examination process to be unsatisfactory given the unacceptable delays in decision-making that this would cause.

145. Turning to the local plan examination, I note the conclusion that no further B8 land is required in paragraph 176 of the local plan examination report[69]. However, this conclusion is based on the exceedance of the jobs growth target rather than any explicit consideration of logistics sector requirements or associated market signals. Whilst allocated B8 land is present in the plan area, this is clearly not suitable.

146. The Rule 6(6) parties supporting the development agree that 2.5 ha and above are the minimum size that can accommodate larger 'strategic' sized warehouses of over 9,000 m^2. They note that this metric is widely accepted across the industry as an appropriate threshold for distinguishing between 'non-strategic' and 'strategic' need. This forms the basis of the assessment of the current supply by the appellant's need witness which considers available buildings (both new and second hand), land of 2.5 ha or more and a pipeline supply of 2.5 ha or more.

147. The building supply schedule of the appellant's need witness gives a total of 114,931 m^2 for buildings, 582,508 m^2 for sites with permission and 395,900 m^2 of allocations[70]. Translated into land area, this comes to a total of 322 ha which is used in the calculation of logistics need. This is more or less equivalent to the supply figure identified by STAUNCH and the appellant consequently takes this into account in reaching its unmet need figure. I note that the Avison Young evidence is not supported by any technical analysis of supply and demand or any detailed consideration of market signals. As such, this opinion-based evidence carries little weight.

148. The Inquiry established that the A14 is a priority route for strategic logistics and this is also emphasised in a number of Council documents[71]. It was built specifically to link the port of Felixstowe to the national motorway network at the junction with the M1 and M6 and provide access to the Midlands and the North. It is essential for the movement of imported and exported goods across the country with Felixstowe accounting for 5.3% of all freight moved through UK ports in 2023[72]. It also provides access to other key freight infrastructure, including the intermodal rail freight terminals at Felixstowe, Ely and Daventry. These connections allow logistics occupiers located along the A14 corridor to integrate rail freight into their supply chains, enabling the efficient movement of goods across the UK by rail.

149. The A14 consequently plays a critical role in enabling the efficient distribution of goods entering and exiting the UK, connecting them to key distribution centres, manufacturing hubs and retail destinations. As such, it is of national importance and ready access to it directly contributes to growth-supporting infrastructure and the networks that support freight and logistics that the Government has identified as a particular priority[73].

150. The appellant maintains that logistics markets along the A14 corridor are supply-constrained, particularly in relation to strategic units over 9,300 m^2. This is based on a bespoke Property Market Area comprising a 2.5 km buffer zone on either side

[69] CD 9.10
[70] Table 8.2, CD 10.1.2.1
[71] Paragraph 5.2.9, CD 10.2.1
[72] Paragraph 5.1.1, CD 10.2.1
[73] CD 7.15

of the A14 between Felixstowe and Rugby which broadly aligns with the 5-minute drive time used in the North Northamptonshire Strategic Logistics Study (2024)[74]. This analysis shows that there are only 2 available buildings within this corridor, namely Unit 1, Crossfire Kettering (9,396 m^2) and Thrapston 151 Unit 1A, Halden's Parkway (14,035 m^2) as well as a planning permission for a building at Rothwell North SUE (10,080 m^2). It concludes that only 33,511 m^2 (3%) is located in proximity to the A14 out of a total supply of around 1,213,099 m^2 [75].

151. The requirements of the prospective occupant of Plot 1, DHL, are not met at these locations because it requires a single, cross-docked, high-bay logistics facility of around 49,703 m^2 with a minimum height of 21 m at the eaves. Although there are a number of sites in Corby, which is just outside the 5-minute drive time, DHL does not find them suitable because they are either below minimum floor/height requirements and/or don't meet locational requirements[76]. It also notes that Westworks is not a suitable alternative, despite being owned by DHL, because it is intended to meet different operational requirements. It maintains that the Site is required because it would enable HGV drivers to make two journeys to Felixstowe and back within an 8-hour shift which would optimise efficiency. Located over nine miles from the A14, DHL maintains that Corby introduces unacceptable inefficiencies in HGV routing and journey times.

152. STAUNCH view the DHL requirements as unique and a contrived attempt to secure permission for a much larger site in the open countryside. It points out that there are no binding contractual obligations and that Symmetry Park in Kettering would serve its needs. However, I note that Symmetry Park is now fully occupied[77] and that there is an established need for more logistics development along the A14 corridor capable of meeting modern warehousing requirements.

153. In general terms the shortfall has been calculated by establishing the need for logistics whilst accounting for completions and supply. According to the appellant, a baseline demand of 948 ha minus a supply of 322 ha leaves an unmet need of 626 ha with a lower estimate of 735 ha leaving an unmet need of 413 ha. The lower estimate is based on an observed 'softening' in net absorption rates across the SEMLEP[78] area during 2023 and 2024 due to macro-economic challenges[79]. Harworth derives an unmet need of 419 ha net developable area whilst IM derives an unmet need of 442 ha. The Council accepted, during the course of the Inquiry, that these assessments are more robust than earlier Iceni work because they are up-to-date and represent the 'best evidence' in relation to current logistics need.

154. Turning to other assessments, the Housing and Employment Needs Assessment (2023) (HENA)[80] identifies an unmet need of at least 140 ha of land for strategic warehousing, in addition to an identified pipeline supply of 277 ha (as of April 2021)[81]. The appellant notes that this value is lower than the average of all four scenarios considered in a 2022 study of warehousing and logistics in the southeast Midlands[82]. This identifies an unmet need of 164 ha which is lower than the 239 ha

[74] CD 7.14
[75] Table 8.5, CD.10.1.2.1
[76] Appendix 3, CD 10.1.1.1
[77] Appendix B, CD 10.1.2.1
[78] South East Midlands Local Economic Partnership
[79] Paragraph 6.1.4, CD 10.1.2
[80] CD 7.12
[81] Paragraph 12.20, CD 7.12
[82] Warehousing and Logistics in the South East Midlands (WLSEM), CD.7.11

that would have been identified had the recommended 'Market Signals – High Scenario' been used in the HENA. The appellant points out that if the more up-to-date supply estimate of 322 ha is compared with the lower demand estimate of the HENA, then there is a shortfall of 205 ha[83].

155. The North Northamptonshire Strategic Logistics Study (2024)[84] identifies an unmet need of 107 ha. Unlike other studies, it does not provide future demand estimates for employment land. Rather, it provides an analysis of potential locations for future strategic logistics development (above 9,000 m^2) based on an evaluation of A-road junctions and settlement type. The criteria do not account for market signals, as required by the Framework, and Growth Towns are scored as a positive factor which reflects the policy preference for growth at these locations. The assessment is therefore oriented towards supporting the policy considerations of the JCS, rather than assessing locations from a purely evidential standpoint.

156. I note that the 'supressed demand' methodology of the appellant has been applied in a number of instances and not just by Savills[85]. STAUNCH make much of the examining inspectors' conclusions in relation to the Warrington Local Plan examination[86] even though the Council concluded that the criticism was due to specific circumstances that did not undermine the methodology as a whole[87]. The criticism was founded on an assumption that the demand was overestimated because it included relocations to and from second hand space. As the appellant's need witness points out, the net absorption approach factors in reoccupation of existing space to ensure an accurate evaluation of net demand[88].

157. Specifically, if there are more move ins over a period, demand is positive indicating more floorspace and land is needed, especially when this coincides with low availability. Conversely, if move outs exceed move ins over a period, demand is effectively negative meaning there is not a need for more floorspace and land, especially if availability is also high. If vacancy is not considered, this can lead to overestimation because the contribution of the building to demand remains positive irrespective of whether it is occupied or not. Consequently, vacancy needs to be taken into account because it represents negative absorption, which is a key market signal.

158. STAUNCH also rely on evidence given by Mr Pestel at a planning inquiry in West Berkshire[89]. The appellant points out that there was no criticism of the 'suppressed demand' methodology in the decision letter and that the point consequently goes nowhere[90]. Although the officer report was critical[91], no such criticisms were presented as part of the Council's case at the Inquiry and it accepted that the methodology was robust. Consequently, this carries little weight.

159. Whilst I do not find the approach to be flawed, I find the lower need estimate to be preferable due to continuing macro-economic challenges and the fact that it is broadly comparable to the undisputed methodologies that have been applied by

[83] Paragraph 6.1.20, CD 10.1.2
[84] CD 7.14
[85] Paragraph 3.5.2, CD 10.1.2
[86] CD 10.4.5.6
[87] Paragraph 3.6.3, CD 10.1.2
[88] Paragraph 1.7.5 – 1.7.7, CD 12.1
[89] CD 10.4.5.7 and ID19
[90] ID62
[91] CD 1.4.1,

Harworth and IM. Even if these were to be rejected, more dated evidence still identifies significant shortfalls which are greater than the area of the proposed development. As such, I find that there is a significant unmet logistics need along the A14 corridor that the proposed development would help to meet.

Highways and Transport

160. The Council, contrary to officer recommendation, applied a putative reason for refusal to traffic impacts but chose not the defend that reason at the Inquiry and set out its position in the relevant SoCG[92].

161. The proposal is supported by technical evidence comprising an ES transport chapter, a transport assessment and a transport assessment addenda[93]. Further evidence on transport matters has also been submitted to the Inquiry by an accredited expert on behalf of the appellant in order to support the round table discussion[94]. There is no objection on highways grounds from the Joint Highways Authorities (JHA) which agreed all of the key technical parameters used in the modelling. They also agree with the findings of the transport assessment process and consider that the proposed measures would fully mitigate the transport impacts of the proposed development[95].

162. I have no alternative transport assessment before me to suggest otherwise nor any technical evidence to the contrary from a suitably qualified and accredited transport witness. The courts have established that the views of relevant statutory consultees, including highway authorities, should be accorded great or considerable weight and that a decision-maker should only depart from their views where there are cogent and compelling reasons to do so[96].

163. STAUNCH raise a number of issues, as set out in its position statement, relating to the Northamptonshire Strategic Transport Model (NSTM), trip rates, longer semi-trailers, journey time validation, junction capacity, mitigation proposals and the Travel Plan[97]. As I have already dealt with this last topic, I only consider the preceding issues. Interested parties also highlighted existing highway issues in relation to congestion and road safety. I have also had regard to an IM response to the STAUNCH position statement, which has been agreed with the appellant[98].

164. The NSTM is a strategic transport model used by the Council which was built and validated in accordance with the nationally recognised parameters for transport modelling[99] using traffic survey data collected in September 2021. A further traffic data collection exercise occurred in October 2022. This demonstrated, to the satisfaction of the JHA, that the earlier 2021 traffic data used was not impacted by abnormal traffic flow fluctuations at the end of the pandemic emergency response. The Council reiterated their approval by email on 28th February 2024[100]. Whilst STAUNCH points out that only two survey points were used in this revalidation, this would have been apparent to the JHA. Furthermore, the appellant's transport

[92] Appendix 4, CD 6.1
[93] CD 1.3.4, 1.3.4.1, 1.3.26 and 1.3.29
[94] CD 10.1.3
[95] Appendix 4, CD 6.1
[96] Shadwell Estates v Breckland DC and Pigeon (Thetford) Ltd [2013] EWHC 12 (Admin) and Visao Ltd v Secretary of State for Housing, Communities and Local Government and Chiltern DC [2019] EWHC 276
[97] CD 10.4.2
[98] ID18
[99] CD 8.15
[100] CD 9.21

witness confirmed that the TRICS database shows that 2021 was not abnormal. The assumption that it was abnormal is not supported by any direct measurement. Consequently, this point is unsubstantiated.

165. Turning to the trip rate, peak hour trip generation for the proposed development was agreed with the Council and based on a review of a range of vehicle trip generation surveys of large-scale, pre-pandemic B8 units. The SoCG notes that the adopted non-local vehicle trip rate at Pineham Park had the highest rate with virtually no non-car usage being observed. In order to provide a local comparator with a similar land use, a vehicle trip generation survey of Halden's Parkway was undertaken. The observed rate was significantly lower than the Pineham Park rates. The JHA agreed that the peak hour analysis should apply the average between the locally observed Halden's Parkway rates and those obtained from Pineham Park.

166. STAUNCH suggest that this has led to an underestimate of road traffic impact because the value derived from Pineham Park is not directly comparable because it has a 30:70 B2/B8 use class split. It notes that B8 TRICS data included in an IM scoping document show a substantially higher trip rate than the one that was subsequently adopted which is more appropriate given the B8 nature of the current scheme.

167. However, I note that Halden's Parkway is more comparable than Pineham Park or other sites on the TRICS database in terms of use class and building size as well as being immediately adjacent and reflective of local travel characteristics. In response to one of my questions, the appellant points out that this includes a similar DHL operation as well as a Primark distribution centre. As such, it reflects trip rates of a site with similar land-uses.

168. The averaging of these trip rates with the higher Pineham Park rates is, if anything, conservative and I do not consequently find the adopted approach to be an underestimate. Furthermore, I find the observation that there were 'lost vehicles' to be unfounded because the turning count data was used to inform the agreed trip rates and not the Automatic Number Plate Recognition (ANPR) survey which was only used to inform the development traffic distribution and not the trip rates[101].

169. Turning to the issue of longer semi-trailers, the appellant suggests that this is essentially a swept path issue. In response to one of my questions, the appellant's transport witness indicated that this had been specifically considered by the Council's road safety team and that no issues were identified due to more recent changes in king pin and tractor configurations. Moreover, I note that in order to avoid changes to existing infrastructure these units are required to pass the turning circle test applied to the existing 13.6 m trailers[102]. As a result, I find the concerns to be unfounded.

170. In terms of journey time validation, the key concern relates to Route 2, Section 2, SB and the results of the model validation report for the Paramics model[103]. In response to my question on this matter, the appellant's transport witness observed that only a 260 m section was out of tolerance and that it was common to get high percentages along short sections of road. The witness also noted that the flows

[101] Paragraph 3.2.10, ID18
[102] Paragraph 3.2.16, ID18
[103] CD 9.39

were generally well correlated and that some failures are typically to be expected and don't invalidate the model. This is reflected in the final conclusion of the report which states that "*the calibration and validation results of the model closely correlate with the observed data and AECOM believe the supporting evidence also provides a reasonable reflection of traffic conditions*".

171. Furthermore, the Council's validation of the model, according to Department for Transport (DfT) guidelines, is as follows: "*Validation of the model was carried out by comparing observed and modelled journey times and routes selected covered all the major roads within the network. During auditing, it was advised to validate the A14 junction off-slips and the exit links as well. All routes assessed validated within TAG requirements*"[104]. Given the above, I find this concern is also unfounded, as well as wider points about the model.

172. Turning to junction capacity, the appellant's transport witness notes that the junction capacity assessments show that the local road network will either work within capacity during the network peak hours or see only a minor deterioration. Although the witness pointed out that mitigation would remedy the situation, it was conceded that there would be a longer period over which congestion would occur around peak hours. STAUNCH observe high ratio of flow to capacity values which indicates that some junctions are already operating either close to the maximum capacity of 0.85 or exceeding this value. Whilst there are clearly capacity issues that could be exacerbated by the proposed development, the key question is whether the increased traffic flows can be mitigated. Although the putative RfR on transport matters sought to suggest that the appellant needs to address existing congestion, it is only responsible for its own impact.

173. Turning to the mitigation proposals, the JHA concluded that the highway impact from the proposed development would be mitigated by the following improvements prior to first occupation: A14 Junction 13, as shown on drawing reference LWL/701/031 Rev D8[105]; A605/Huntingdon Road Roundabout, as shown on drawing reference LWL/701/021 Rev D7[106]; and A605/Oundle Road Roundabout, as shown on drawing reference STN/HGN/SW/DR/C/0102 REV P02[107]. The requirement to undertake these works is secured through Grampian conditions.

174. Specifically in relation to the A14 junction, I note that traffic signals would enable control of traffic exiting the A14 and reduce the chance of queuing on the A14 occurring. This would also create gaps in traffic on the circulatory carriageway of the junction thereby enabling southbound traffic to enter the roundabout from the A605. The other measures would comprise widened entry and exits at the A14 junction as well as the A605/Huntingdon Road and A605/Oundle Road junctions which would encourage the freer flow of traffic, as would the changes in geometry. I note STAUNCHs scepticism concerning the effectiveness of the proposed changes, however, the views of the JHA are to be preferred on this matter and are to be given greater weight as a result of its expertise.

175. Turning to road safety, I note the updated road safety audit that has been produced[108]. Personal road injury collision data was acquired from North

[104] Appendix O, CD 9.39
[105] CD 1.2.59
[106] CD 1.2.54
[107] CD 1.2.65
[108] Appendix 4, CD 1.3.29

Northamptonshire Council for the most recent five-year period available, 1 February 2020 to 31 January 2025. This data provided the location of each collision within the study area, as well as details on the nature of the collision, such as the collision severity, vehicle types, road conditions, and casualties. The study area considers the links and junctions within the local area and includes all of the junctions that would be subject to the mitigation works.

176. Three collisions were personal injury collisions involving pedestrians/cyclists whilst the remainder only involved vehicles with no further incidents involving either pedestrians or cyclists. The three collisions, whilst regrettable, do not suggest any significant existing road safety issue. The observed collisions on links and at junctions were compared with what would be expected for the road configuration and traffic volume in accordance with the DfT's COBALT software guidance.

177. This analysis identifies that at each of the links and junctions considered within the study area, the number of observed collisions is generally lower than anticipated. This confirms that there are no significant existing highway safety issues at the junctions and links that were considered. As such, there is no reason why the increased vehicle flows from the proposed development would disproportionately increase the number of personal injury collisions on those parts of the road network in the vicinity of the Site.

178. I understand the genuine concerns of a significant number of local residents in relation to this matter and note the representations that have been made by interested parties. There is no doubt in my mind concerning the existing levels of congestion and I acknowledge the fears that further congestion would lead to a deterioration of road safety. However, bearing in mind the proposed mitigation measures as well as the results of the road safety audit, I have no technical evidence before me to suggest that there would be a significant road safety impact. My decision can only be made on the basis of a technical appraisal rather than generalised concerns which are understandably and most commonly associated with such proposals.

179. STAUNCH highlights concerns over the use of Islington by HGVs and suggests that the only way to control movement would be through an ANPR camera given the difficulties associated with enforcing a Traffic Regulation Order (TRO) in a rural location. The Council Highways Authority has indicated that it would not be willing to maintain an ANPR system at that location. It was suggested that the appellant should take on this cost. However, the TRO would be a statutory obligation which the Council has a duty to enforce. I note that they are routinely used to control HGV movements arising from new development and I find it proportionate in this instance. I also note that a contribution towards the implementation and monitoring of the TRO is secured via the s106 and that an operational management plan, with details of HGV routing, would be conditioned which would add a further layer of control.

180. Having carefully considered all of the highway concerns raised by STAUNCH and interested parties, I find that there is insufficient substantiated evidence to suggest that the proposal would lead to an unacceptable impact on highway safety or that the residual, cumulative impacts on the road network, following mitigation, would be severe despite changes to the period over which congestion would occur. There are no cogent or compelling reasons to depart from the findings of the JHA on this matter. Given the above and considering all other matters raised, I find that the

proposal would not conflict with Policies 8, 15 and 16 of the JCS or paragraph 116 of the Framework.

Other Matters

Flood Risk and Drainage

181. The site is located entirely within Flood Zone 1, i.e. land with less than 1 in 1,000-year annual probability of river or sea flooding (<0.1% Annual Exceedance Probability). Interested parties have, however, highlighted regular flooding in Polopit, the Leys and London End during the winter, particularly at the convergence of a number of small watercourses in the Leys area of Polopit.

182. I note that surface water runoff within the Site would be intercepted by a series of gullies and drainage pipes and conveyed to two proposed surface water attenuation ponds located adjacent to its northern boundary. Pollutants arising from oil and diesel spillage would also be intercepted and stored in a separate tank. The two attenuation ponds would be designed to accommodate runoff from rainfall events up to and including the 1 in 100-year event plus a 40% allowance for climate change.

183. Surface water run-off would be discharged to the local watercourse, which runs along the north-eastern site boundary from the attenuation ponds, at the equivalent greenfield run-off rate for rainfall events up to and including the 1 in 100-year return period. The levels within the development would be designed so that any exceedance would be intercepted by the road network within the Site which would be used to convey any excess overland flows towards the attenuation ponds.

184. The submitted Flood Risk Assessment is underpinned by catchment modelling which shows a betterment to existing downstream flood risk[109]. Across all modelled events, it shows that the effect of the development generally leads to a betterment in downstream flood risk compared to the baseline scenario. Although the Polopit area is not explicitly included within the modelling, it is expected that if there is betterment across all modelled events seen in downstream areas of the model, this would also be experienced within Polopit in terms of the connected watercourse and direct discharge from the Site.

185. I note that the flood risk and drainage issues associated with the proposed development has been assessed by the statutory consultees which includes the Lead Local Flood Authority and the Environment Agency. There are no outstanding objections from officers or technical consultees and the necessary mitigation would be secured by suitable conditions which would ensure the ongoing management of the attenuation areas as well as the implementation of a drainage strategy. As with the transport effects, only additional flood risk and drainage effects need to be mitigated rather than discharges from other watercourses that may be contributing to flooding in Polopit.

BMV

186. The planning application was accompanied by an agricultural land quality survey which was not part of the ES. This necessitated the submission of an ES addendum which reflected its findings[110]. The survey concluded that the land is a

[109] CD 1.3.10.1
[110] CD 1.1.9 and CD 1.3.30

mixture of shallow and brashy soils over limestone and deeper poorly drained clayey soils. The quality of the land is limited principally by wetness and workability together with droughtiness and occasionally topsoil stoniness, which restrict the land to a mix of Grade 3a and 3b. A previous survey of the southern half of the Site, conducted in 1989, showed that it largely comprised Grade 3a soils with two small areas of Grade 2 soil. The current survey shows there would be a permanent loss of 17.2 ha of Grade 3a land.

187. STAUNCH dispute this assessment and maintain that if just the data from the previous survey is considered, there would be a loss of 5 ha of Grade 2 land and 13.9 ha of Grade 3a. It goes on to suggest that the use of 'hand texturing' was not sufficiently robust and that laboratory analysis should have been carried out bearing in mind the higher grades of land that were identified by the previous survey. STAUNCH highlights the fact that guidance suggests that laboratory analysis is necessary where the distinction between adjacent textural groups results in a change in the ALC grade[111]. It also suggests that the presence of calcareous soils should have raised the soil grade which could amount to a loss of as much as 32 ha of BMV.

188. I accept that the survey did not follow the necessary guidelines and that a more accurate evaluation would have been derived from a laboratory analysis. However, the only alternative quantification I have before me from the previous survey suggests that, at most, only an additional 1.7 ha of BMV might be lost which I do not consider to be significant given its magnitude and the fact that it would remain below the statutory consultation threshold. The assertion that it could be as much as 32 ha is unsubstantiated by any empirical evidence and is based only on opinion. Nevertheless, a loss would occur and this needs to be weighed in the planning balance.

Human Rights

189. An interested party drew my attention to the potential for the proposal to affect the rights of children. Article 3(1) of the United Nations Convention on the Rights of the Child (UNCRC) provides that 'in all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration'.

190. Although such rights have not been incorporated into UK law, the Courts have indicated that the scope of planning decisions and the nature of the right to respect for family and private life are such that planning decision-making will often engage Article 8 of the Human Rights Act 1998 (as amended) which should be viewed through the lens of Article 3 of the UNCRC[112]. In those circumstances, relevant Article 8 rights are a material consideration that must be taken into account.

191. The mechanism through which the interests of the child would be adversely affected were not detailed but there was a generalised concern that the proposal would have an effect and that this had not been considered by the Council. As the proposed development would not be in close proximity to any residential areas and is associated with private land any such impacts would be indirect and primarily related to increased vehicle movement. As I have already concluded, there would

[111] CD 10.4.4.5
[112] Stevens v SSCLG & Guildford BC [2013] EWHC 792 (Admin)

be no disproportionate effect on road safety and HGV movements along Islington into the village of Titchmarsh would be controlled by a TRO. I have no evidence before me to suggest that there would be any significant, adverse air quality impacts nor any other indirect effect capable of interfering with Article 8 or the rights of a child. Moreover, no detailed argument has been put concerning specific effects on particular properties or individuals.

192. Given the above, I am satisfied that were I to allow this appeal that this would not unacceptably interfere with the rights of the child in relation to the right to a private and family life and home.

Planning and Heritage Balance

193. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise[113].

194. The appellant maintains that the balance in favour of sustainable development applies because the basket of policies most important for determining the appeal are "out of date". In this respect, Policies 11, 23 and 24 of the JCS are specifically identified but not Policy 2 or 3 of the JCS because these were viewed as not being fundamental to the determination of this case by the appellant's planning witness. However, I disagree on the basis of the landscape and heritage harm that I have found and consequently consider these to also be part of the basket, as well as Policy EN12 of the LP. Harworth also identify Policy 22 but I do not find this to be determinative and therefore do not include it in the basket. Similarly STAUNCH highlight Policy EN1 of the LP. As it is silent in relation to anything other than committed major development in Thrapston I also do not find it fundamental to my determination.

195. The Courts have established that the proposition that the basket is out of date must be tested[114]. Firstly, by identifying the most important policies and asking if each one is out of date and secondly, by then stepping back and asking if the basket as a whole is out of date. It may be that certain policies may be so determinative that this causes the whole basket to be out of date. The appellant takes this view in relation to Policy 24. The Courts have also established that this is a matter of planning judgement[115].

196. Policy 24 of the JCS states that logistics proposals, including large scale strategic distribution, will be supported insofar as they comply with the spatial strategy. Policy 11 sets out the spatial strategy and seeks to distribute development to strengthen the network of settlements in accordance with the roles in Table 1 and to support delivery of the place-shaping principles set out in Table 2. In particular, it states that Growth Towns will be the focus for infrastructure investment and higher order facilities to support major employment, housing, retail and leisure development. Consequently, the location of new logistics development in Policy 24 is constrained by Policy 11.

[113] Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 (as amended)
[114] Paul Newman Homes v SSHCLG [2021] EWCA Civ 15, approving Wavendon Properties Ltd v SSHCLG and Milton Keynes Council [2019] EWHC 1524 (Admin)
[115] CD 10.8

197. As Thrapston is defined as a Market Town, any growth in homes and jobs is only intended to support regeneration and local services at a scale appropriate to the character and infrastructure of the town. There is no dispute that the proposed development would conflict with these policies, but the appellant takes issue with Policy 24 because it has been overtaken by events on the ground which the Courts have identified as an important consideration[116]. This has given rise to a logistics need along the A14 corridor rather than in Growth Towns, such as Corby or Wellingborough, where such development is specifically directed. I find this to be the case due to the significant unmet need that has been identified and the clear market signals which favour the A14 corridor, as set out in this decision.

198. The appellant also points out that this policy has been overtaken by events, namely through changes to the Framework. In this respect, I find this policy to be inconsistent with the Framework which strongly supports market-facing logistics policies and decisions. In particular, the need to identify suitable locations for freight and logistics, address the specific locational requirements of different sectors and make provision for storage and distribution operations in suitably accessible locations that allow for the efficient and reliable handling of goods[117].

199. The inconsistency emerges because Policy 24 resists logistics development unless it complies with a spatial strategy based on the settlement hierarchy. Although STAUNCH seeks to establish that there have been no substantive changes to the Framework, the version against which the JCS was examined and adopted only has a single reference to market signals and lacks any detail concerning the specific requirements of the freight and logistics sector. The substance of paragraphs 86 and 87 are simply not reflected and I find this policy out of date as a result.

200. Policy 11 of the JCS sets out the spatial strategy and states that development will be distributed to strengthen the network of settlements in accordance with the spatial role allocated to it within the plan. There is a tension between the key themes of the JCS to deliver sustainable development within the settlement hierarchy and the objective to deliver economic prosperity through a more positive and flexible approach.

201. The effect has been to limit the supply of strategic logistics sites needed to meet market demand by restricting it to just four Growth Towns. As with Policy 24, it does not reflect the specific requirements of the freight and logistics sector. This is against a backdrop of significant unmet need of at least 107 ha, according to the Council's own data, let alone the higher estimates that this Inquiry has derived. I therefore find this policy to be out of date as well..

202. Policy 23 of the JCS seeks to stimulate job growth and to ensure that enough land is identified to ensure balanced economic growth and identifies a number of strategic employment sites and SUEs where this should occur. The commentary on this policy confirms that the list of sites is not exhaustive and proposals that deliver jobs growth and economic prosperity will be positively considered, subject to compliance with the plan. This is within the context of the spatial strategy which constrains the delivery of major employment, outside the identified areas, to Growth

[116] CD 10.8, Peel Investments v Secretary of State for Housing, Communities & Local Government [2020] EWCA Civ 1175
[117] Paragraphs 86(c) and 87

Towns. Indirectly, this constrains logistics growth and fails to reflect paragraphs 86 and 87 of the Framework. As such, I find this policy to be out of date.

203. Turning to the other policies in the basket, namely Policies 2 and 3 of the JCS and Policies EN1 and EN12 of the LP, I find these to be consistent with the Framework and this is not disputed by any of the parties. However, stepping back and considering the basket as a whole, I give Policies 11, 23 and 24 greater weight as a result of the bearing they have on the determinative matters of this case and the putative reasons for refusal. Consequently, the basket is dominated by the constraints of the spatial strategy in relation to logistics development and its inconsistency with the Framework. As such, I find the whole basket to be out of date.

204. Both STAUNCH and the Council suggest that there is no trigger in the Framework for any presumption in favour of logistics development. This is because there is no explicit B8 requirement comparable to the requirement for a 5-year Housing Land Supply for residential development that is highlighted in Footnote 8 of paragraph 11(d). However, the footnote highlights what should be done in relation to applications involving the provision of housing and 'includes' this as an example rather than stating that this is the only circumstance in which less weight to policy conflicts may apply. Consequently, the Framework applies this balance where the planning facts require that judgement to be made and it applies to logistics just as much as any other type of development.

205. Paragraph 11(d)(i) of the Framework indicates that where the most important policies are out of date that permission should be granted unless policies in the Framework, that protect assets of particular importance, provide a strong reason for refusing development. Footnote 7 indicates that this applies to designated heritage assets as well as SPA and Ramsar sites. Whilst I have found that there would be no adverse effect on the latter, I have found harm to the former.

206. In terms of the public benefit balance of the harm that would be caused to the designated heritage assets, I am left in no doubt that there are very significant public benefits, specifically in relation to the economic and social benefits of the scheme. This comes at a cost in terms of the failure to preserve the setting of a number of listed buildings and the Titchmarsh Conservation Area. Despite this cost, it seems to me that there is a clear and convincing justification for that harm to be accepted which was at the lower end of less than substantial. Consequently, there is no strong reason to refuse the proposed development in relation to paragraph 11(d)(i).

207. Turning to paragraph 11(d)(ii), this indicates that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. The appellant has identified a number of benefits that are not of the same material weight in this balance. I shall consider these and group them accordingly.

208. The first group relates to benefits that are either to be expected from any development of the site, simply serve the development itself in terms of mitigation or are a requirement of policy. As such, they are either an inevitable consequence of development or of limited wider benefit and only attract limited weight:

- The delivery of net zero buildings with renewable energy generation would reduce carbon emissions during the operational phase but this is counterbalanced by the construction phase that would lead to significant embodied carbon in buildings with a limited lifespan as well as vehicle emissions. The exceedance of the BREEAM policy requirement is also no more than the market expects in a modern building.

- New green infrastructure including SUDS, structural planting and the provision of new cycling and walking connections are no more than is expected to mitigate the environmental impacts of the scheme and ensure a policy compliant choice of alternative transport modes.

209. The next group is one to which moderate weight can be attached because wider benefits would accrue beyond what would normally be expected:

- Although the appellant contends that BNG of greater than 10% would be achieved, the calculations have been disputed. I nevertheless find that there would be an increase in biodiversity in the longer term in comparison to the intensively managed arable land that currently predominates. This is because new landscaping would include the planting of 10 ha of trees and 1.5 km of new hedgerows as well the creation of a diverse range of new habitats and the more extensive management of 44 ha of adjacent land.

- The drainage scheme would lead to a reduction of the off-site flood risk in Polopit which would be a betterment that would go beyond just mitigating the impacts of the proposal.

- Whilst an investment of around £5 m to improve the highway network is no more than is expected to mitigate the highway impacts of the proposal, there would be additional transport benefits in terms of the additional bus service that would serve the wider community as well as a potential reduction in out-commuting and the encouragement of more sustainable patterns of car use.

210. The final group to which significant weight can be attached comprise benefits that would make a substantial contribution to the local area:

- Meeting the unmet needs of the distribution and logistics sector which would support substantial economic growth and productivity. This would include a significant capital investment of around £120 m in the local economy through the development process as well as the generation of around £111 m gross value added (GVA) per annum. Annual business rates of around £4 m would also be payable to support local services and investment by the local authority.

- Significant new employment opportunities, including indirect and supply chain employment, through both construction and operational phases. This would include around 2,727 full time equivalent (FTE) (gross) new jobs across a range of skills profiles and salary bands which would equate to around 1,800 net additional jobs during the operational phase. There would also be around 142 FTE direct local construction jobs per annum as well as additional indirect and induced construction employment.

- The provision of training and skills initiatives, including links to further education providers.

211. On the other side of the balance are a number of harms:

- The proposal would undermine a plan-led approach that seeks to direct logistics and major employment development to Growth Towns. The planning system should be genuinely plan-led with up-to-date plans that make sufficient provision for infrastructure which meets the locational requirements of particular sectors. Whilst the JCS seeks to secure sustainable development at specific locations, this does not take account of the needs of the freight and logistics sector and it is out of date in this respect but not others which seek to distribute other development in a sustainable manner. I therefore give this harm moderate weight.

- The proposal would lead to adverse effects on the character and appearance of the open countryside. However, this would be within a relatively localised context that has already been influenced by nearby development comprising Halden's Parkway and the A14. Around 15 ha of the site has also been influenced by previous mineral extraction and subsequent landfill. As such, I give this harm moderate weight.

- Less than substantial harm to the setting of a number of listed buildings and the Titchmarsh Conservation Area would be caused. Despite being at the lower end of less than substantial and with the harm being outweighed by the public benefits, I nevertheless give this harm great weight, in accordance with paragraph 212 of the Framework.

- The proposal would lead to a loss of BMV. This would be between 17.2 and 18.9 ha which would be below the 20 ha significance threshold for statutory consultation and also of limited extent in an area with an abundance of such land. As such, I give this harm limited weight.

- The loss of Castle Manor Farm non-designated heritage asset would occur but that harm would be limited bearing in mind the significance of that asset. As such, I give this harm limited weight.

- A loss of approximately 1,145 m of historic hedgerow would occur. This would only affect a small proportion of the total Parish boundary and a hedgerow that lacks any connection at one end. As such, I give this harm limited weight.

212. In the final balance, I regard the significant benefits of the proposed development sufficient to outweigh any degree of policy conflict with respect to a plan-led approach, landscape, heritage and BMV. On this basis, I conclude that planning permission is justified. It follows that the adverse impacts of granting the permission sought in this appeal would not significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole.

Conditions

213. I have considered both the wording and grounds for the conditions agreed with the Council in accordance with the tests set out in paragraph 56 of the Framework.

Subject to the amendments that were considered in the round table discussion, I am satisfied that they meet the necessary requirements. Furthermore, all pre-commencement conditions have been accepted by the appellant in writing and are consequently compliant with the necessary legislation.

214. I have modified condition 23 because any permission relating to highway works would be associated with the land rather than the appellant and because it cannot compel anyone else, such as the Highways Authority, to do something. For the same reason, I have modified other conditions that have obliged the LPA to approve something in consultation with various bodies and organisations.

215. I have also modified condition 42 in order to ensure that the quality and importance of archaeological remains are fully assessed and to give greater clarity over the preservation of remains. I have considered whether highway works should be a pre-commencement condition. However, I do not find this reasonable as these are intended to mitigate impacts that would arise from the operational phase of the development rather than the construction phase. As such, I find that this should be completed prior to first use, as drafted.

216. I consulted over an additional condition relating to the FLL mitigation after the close of the Inquiry and have carefully considered the comments received. On further reflection, I find it would not be reasonable as climate variation and a host of other factors could affect migratory patterns which means that the numbers recorded waders would not be solely indicative of the success or otherwise of the proposed management practices. Consequently, this is best considered through the annual reporting and adaptive management, as secured through the s106.

Planning Obligation

217. The completed s106 is dated 28 August 2025. It was subject to refinement during the course of the Inquiry and a completed version was submitted after it closed. It is an agreement between Equities Newlands (Thrapston East) Ltd, North Northamptonshire Council, Margaret Mary Linnel and Alun Camp.

218. The Council provided a justification for the contributions as well as the calculations for the amounts that have been sought[118]. It is satisfied that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

219. For the reasons set out and after careful consideration, I agree with the Council's assessment and that it therefore accords with paragraph 57 of the Framework.

220. The s106 sets out the following financial contributions:

- £2,193,672 bus service contribution with tapered payments over a 10-year period under Scenario A with 20% payable upon commencement, 20% upon first occupation, 10% on the second to fourth anniversaries and 5% on the fifth to tenth anniversary;
- £2,500 monitoring fee payable upon commencement.
- £6,000 TRO monitoring contribution payable upon first occupation.

[118] CD 11.2

- £10,000 TRO implementation contribution within 30 days of the grant of planning permission.
- £6,000 Travel Plan monitoring fee payable upon first occupation.
- £500 FLL monitoring contribution paid annually for a period of 80 years.

221. More broadly, the s106 secures the following deliverables:

- Public transport travel card which entitles the bearer to free travel for a period of six months upon first occupation of each unit.
- Provision of approximately 44 ha of FLL mitigation immediately to the north of the Site with associated management and monitoring for a period of 80 years.
- An approved bus services strategy prior to first occupation and the submission of annual bus service review data for a period of 10 years.
- The demolition of Rectory Farm House prior to first occupation of the proposed development.

222. STAUNCH is of the opinion that the trigger point for the demolition of Rectory Farm House is inadequate because the owners are not party to the agreement and because of construction phase impacts. However, the owners of this property do not need to be party to it because the trigger applies to the development and construction phase impacts are controlled by suitable conditions.

Conclusion

223. For the above reasons and having regard to all other matters raised, I conclude that subject to the attached schedule of conditions and the obligations in the s106, that this appeal should be allowed.

R Catchpole

INSPECTOR

ABBREVIATIONS

ANPR – Automatic Number Plate Recognition

AOD – Above Ordnance Datum

BCT Guidelines – Bat Conservation Trust Guidelines

BMV – Best and Most Versatile

BNG – Biodiversity Net Gain

BRC – Biological Records Centre

CD – Core Document

DfT – Department for Transport

ES – Environmental Statement

FTE – Full Time Equivalent

Ha – Hectares

Harworth – Harworth Estates and Investments Ltd

HE – Historic England

HEGS – Hedgerow Evaluation and Grading System

HENA – Housing and Employment Needs Assessment (2023)

HGV – Heavy Goods Vehicle

HRA – Habitats Regulations Assessment

IM – IM Properties Developments Ltd

JCS – North Northamptonshire Joint Core Strategy 2011-2031 (2016)

JHA – Joint Highways Authorities

JNCC – Joint Nature Conservation Committee

LCT – Landscape Character Type

LP – East Northamptonshire Part 2 Local Plan (2023)

LVIA - Landscape and Visual Impact Assessment

M – Metres

NE – Natural England

NSTM – Northamptonshire Strategic Transport Model

PRoW – Public Rights of Way

S106 – Planning Obligation

SoCG – Statement of Common Ground

SPA – Special Protection Area

SSSI – Site of Special Scientific Interest

STAUNCH – Save Titchmarsh and Upper Nene Countryside Habitats

SUDS – Sustainable Drainage System

SUE – Sustainable Urban Extensions

The Act – Planning (Listed Buildings and Conservation Areas) Act 1990

The EIA Regulations - Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017

The Framework – National Planning Policy Framework 2024

The NERC Act – Natural Environment and Rural Communities Act 2006 (as amended)

The Regulations – Conservation of Habitats and Species Regulations 2017 (as amended)

The Site – The appeal site

TRO – Traffic Regulation Order

UNCRC – United Nations Convention on the Rights of the Child

APPEARANCES

FOR THE APPELLANT:

Mr Rupert Warren KC Barrister instructed by Freeths LLP

He called:

Mr Jackson BA (Hons) Dip LA CMLI

Mr Powney BUrbanEnvPlan MBA MRTPI

Mr Hoy BSc (Hons) PGDip MCIEEM

Mr Harley BSocSc (Jnt Hons) MPhil MRTPI

Roundtables:

Mr Moan BA MCIfA

Mr Hopkins Beng (Hons) MSc CMILT MCIHT

Mr May LLB LARTPI

FOR THE LOCAL PLANNING AUTHORITY:

Mr Gary Grant Barrister instructed by the solicitor for the Council

He called:

Mr Robinson-Hodges BSc (Hons) MA MRTPI

Roundtable:

Ms Roy

FOR THE STAUNCH RULE 6 PARTY:

Mr Paul Stinchcomb KC Barrister instructed by STAUNCH Campaign Ltd

He called:

Mr Shapland

Mr Bailey MRTPI (retired)

Mrs Fletcher BSc (Hons)

Roundtable:

Mr Scotland

FOR THE HARWORTH ESTATES INVESTMENTS LTD RULE 6 PARTY:

Mr James Strachan KC

Mr Daniel Kozelko Barristers instructed by Walker Morris LLP

They called:

Mr Roberts BSc (Joint Hons) MPhil AssocMRTPI MIED

Mr Lewis-Roberts BA (Hons) MRTPI

FOR THE IM PROPERTIES DEVELOPMENT LTD RULE 6 PARTY:

Mr Paul Tucker KC Barrister instructed by Stantec UK Ltd

He called:

No witnesses

INTERESTED PARTIES:

Cllr Brackenbury	Thrapston Ward
Cllr Hawkins	Thrapston Town Council
Cllr Hakewill	Rothwell and Mawsley Ward
Cllr Prestwich	Titchmarsh Parish Council
Cllr Garner	Thrapston Ward
Mr Mayes	Council for the Protection of Rural England
Cllr Treffgarne	Eight Local Parish Councils
Mr Barron MP	Corby and East Northamptonshire
Mr Purseglove	Local Resident (written statement)
Ms Cole	Local Resident
Mr Jeffries	Local Resident
Mr Franklin	Local Resident
Mr Curtis	Local Resident
Ms Coulson	Local Resident
Ms Rolfe	Local Resident
Ms Brackenbury	Local Resident
Mr Ross	Local Resident
Mr Smith	Local Resident
Mr Faulder	Local Resident
Mr Capp	Local Resident

Ms Stokes	Local Resident
Ms Snowdon	Local Resident
Ms Smith	Local Resident
Mr Wheeler	Local Resident
Mr Manning	Local Resident
Mr Ellis	Local Resident
Ms Corker	Local Resident
Mr Johnson	Local Resident
Mr Brown	Local Resident
Mr Jones	Local Resident
Ms Cheyney	Local Resident
Ms Woodward	Local Resident
Ms Sparrow	Local Resident
Mr Brown	Barnwell Parish Council
Mrs Davis	Local Resident
Ms Nicholls	Local Resident

DOCUMENTS

ID1 – Appeal Decision (APP/M2840/W/24/3354297)

ID2 – Rebuttal Statement of Julia Fletcher (STAUNCH)

ID3 – Committee Minutes for IM Properties Development

ID4 – Opening Statement (Appellant)

ID5 – Opening Statement (Harworth)

ID6 – Opening Statement (IM)

ID7 – Opening Statement (STAUNCH)

ID8 – Opening Statement (Council)

ID9 – CPRE Statement Transcript

ID10 – Cllr Treffgarne Statement Transcript

ID11 – Historic Map (STAUNCH)

ID12 – Mr Barron MP Statement Transcript

ID13 – Cllr Prestwich Statement Transcript

ID14 – Cllr Hakewill Statement Transcript

ID15 – Revised Inquiry Timetable

ID16 – Mr Purseglove Statement Transcript

ID17 – Draft s106 Agreement and Mitigation Strategy

ID18 – Highway Position Statement Rebuttal (IM)

ID19 – Berkshire Appeal (APP/W0340/W/25/3360702)

ID20 – FLL Mitigation Strategy Rebuttal (STAUNCH)

ID21 – Biodiversity SPD for Nottinghamshire

ID22a – Upper Nene Valley Gravel Pits SPA SPD

ID22b – Natura 2000 Data Form – Upper Nene Valley Gravel Pits

ID22c – Aldwincle Marsh SSSI Citation

ID22d – Titchmarsh Meadow SSSI Citation

ID22e – Ramsar Information Sheet – Upper Nene Valley Gravel Pits

ID23 – Cole Transcript

ID24 – Jeffries Transcript

ID25 – Franklin Transcript

ID26 – Coulson Transcript

ID27 – Rolfe Transcript

ID28 – Ross Transcript

ID29 – Smith Transcript

ID30 – Faulder Transcript

ID31 – Capp Transcript

ID32 – Stokes Transcript

ID33 – Snowden Transcript

ID34 – Wood Transcript

ID35 – Manning Transcript

ID36 – Ellis Transcript

ID37 – Jones Transcript

ID38 – Cheyney Transcript

ID39 – Woodward Transcript

ID40 – Brown Transcript

ID41 – Historic Hedgerow Statement (STAUNCH)

ID42 – Footpath Map

ID43 – GLIVIA3 Technical Guidance Note (LITGN-2024-01)

ID44 – Pre-Action Protocol Letter (STAUNCH)

ID45 – Second Draft Conditions

ID46 – Second Draft s106 Agreement

ID47 – Curtis Transcript

ID48 – Johnson Transcript

ID49 – Planning and Ecology Proof Errata (Appellant)

ID50 – Upper Nene Valley Gravel Pits SPA Conservation Objectives

ID51 – Upper Nene Valley Gravel Pits SPA Citation

ID52 – IM Closing Statement

ID53 – Pre-Action Protocol Letter Response (IM)

ID54 – Final Draft Conditions and Map

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CONDITIONS

1. The development hereby permitted in full shall commence not later than the expiration of three years beginning with the date of this planning permission.

Reason: To comply with planning legislation according to the provisions of section 91 and 92 of the Town and Country Planning Act 1990, as amended by section 51 of the Planning and Compulsory Purchase Act 2004.

2. Details of the Reserved Matters (access, appearance, landscaping, layout, and scale) for each plot of the development permitted shall be submitted to and approved in writing by the Local Planning Authority before any development is commenced on that plot and thereafter the development shall be carried out as approved.

Reason: To comply with planning legislation according to Section 51 of the Planning and Compulsory Purchase Act 2004.

3. The development to which the outline element of this permission relates shall be commenced either before the expiration of five years from the date of this permission or before the expiration of two years from the date of approval of the last of the Reserved Matters to be approved, whichever is the later.

Reason: To comply with planning legislation [the provisions of Section 92 of the Town and Country Planning Act, 1990 (as amended)].

4. The development hereby permitted in full shall be carried out in full accordance with the following plans:

   - Site Plan: Drawing ref. HRT-pHp-01-XX-DR-A-4432-100 rev P4
   - Plot 1 Landscape Proposals Plan: Drawing ref. HRT-BCA-ELS-XX- DR-L-2227-21-01- S4 rev P7
   - Permissive Route Greenway: Drawing ref. HRT-pHp-01-XX-DR-A- 4432-060-P02
   - Unit 01 - GA Gatehouse Detail: Drawing ref. HRT-pHp- 01- ZZ-DR-A-4432-204 rev P2
   - Unit 01 – GA Hub Plans: Drawing ref. HRT-pHp- 01-ZZ-DR-A-4432- 203 rev P2
   - Unit 01 – Building Elevations: Drawing ref. HRT-pHp-01-XX-DR-A- 4432-300 rev P8
   - Site Sections: Drawing ref. HRT-pHp-01-XX-DR-A-4432-101 rev P03
   - Unit 01 - GA Roof Plan: Drawing ref. HRT-pHp-01-RF-DR-A-4432-202 rev P4
   - Unit 01 – GA Office Plans. Drawing ref. HRT-pHp-01-ZZ-DR-A-4432- 201 rev P4
   - Unit 01 – GA Plan Level 00 Drawing ref, HRT-pHp-01-00-DR-A-4432- 200 rev P4

Reason: To clarify the terms of the planning permission and to ensure that the landscaping details are appropriate in the interests of visual amenity and biodiversity interests, and to secure sustainable development.

5. The development to which the outline element of this permission relates shall be carried out in accordance with the following plan:

    - Parameters Plan: Drawing Ref. HRT-PHP-01-XX-DR-A-4432-014 Rev P36

Reason: To clarify the terms of the planning permission and to ensure that the landscaping details are appropriate in the interests of visual amenity and biodiversity interests, and to secure sustainable development.

6. Development shall be carried out in accordance with the approved Phasing Plan (Sheet 1: HRT-PHP-01-XX-DR-A-4432-050 P09 and Sheet 2: HRT-PHP-01-XX-DR-A-4432-051 P13) with updated Phasing Plans to be submitted to the local planning authority and agreed in writing as required over the course of the development.

Reason: To ensure that approved development is delivered in a co- ordinated manner and that all highways and other mitigations are delivered at the correct time.

7. Prior to the commencement of any plot containing a building within the development hereby approved in outline, and notwithstanding the submitted illustrative details, a revised schedule of the materials and finishes for the external walls and roof(s) for that plot shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development of that plot shall be carried out in accordance with the approved materials.

Reason: To ensure the satisfactory appearance of the completed development in relation to the surrounding area and visual amenity.

8. Reserved Matters applications for the plots approved in outline that contain a building shall include a plan showing full details of the finished floor levels in relation to existing and proposed site levels for that plot. This shall be submitted to and approved in writing by the Local Planning Authority and thereafter the development of that plot should be carried out in accordance with the approved finished floor levels plan.

Reason: To ensure the satisfactory appearance of the completed development in relation to the surrounding area and visual amenity.

9. The structural landscaping earthworks, screening bund, and 'Greenway' link are to be provided in accordance with the Phasing Plan. The landscaping details for these areas shall be submitted to and approved in writing by the Local Planning Authority prior to being implemented, and the planting shall be implemented in the first planting and seeding season following the completion of the earthwork bunds. Any plant that dies, is diseased or damaged within 10 years of planting shall be replaced with a plant of similar size and species.

    The landscaping detail must:

    - Include details of the proposed hard and soft treatment of all landscaped areas (including earthworks);

- Include details of all proposed tree and shrub planting including their species, number, size and location and grass seeded / turfed areas;
- Include details of the existing trees and hedgerows to be retained and those to be felled and include existing and proposed soil levels at the base of each tree/hedgerow and minimum distance between base of the tree and the nearest edge of any excavation;
- Maximise the use of site won materials in the creation of the development plateau and landscape bunds, except where issues are identified by condition 27; and
- Maintain effective root protection areas according to British Standard 5837:2012.

Reason: To ensure the delivery of a high-quality landscape setting for the whole completed development in relation to the surrounding area, to enhance biodiversity and visual amenity, and to provide the necessary mitigation of the impacts of the development.

10. Reserved Matters applications for the plots approved in outline shall include landscaping schemes which must:

- Include details of the proposed hard and soft treatment of all landscaped areas (including earthworks);
- Include details of all proposed tree and shrub planting including their species, number, size and location and grass seeded / turfed areas; and
- Include proposed soil levels at the base of each tree/hedgerow and minimum distance between base of the tree and the nearest edge of any excavation.

Reason: To ensure the delivery of a high-quality landscape setting for the whole completed development in relation to the surrounding area, to enhance biodiversity and visual amenity, and to provide the necessary mitigation of the impacts of the development.

11. All planting, seeding or turfing in the approved landscaping details for each plot shall be carried out in accordance with BS4428: 1989, or the most up to date British Standard, in the first planting and seeding seasons following the occupation of any of the building(s) in that plot, or on the completion of the development, whichever is the sooner. Any trees, herbaceous planting and shrubs which, within the period of five years from the completion of that phase die, are removed or become seriously damaged or diseased shall be replaced in the current / next planting season with others of similar size and species.

Reason: To ensure the satisfactory appearance of the completed development in relation to the surrounding area and visual amenity.

12. Prior to the occupation of any building, details of crime prevention measures (including CCTV) for that plot shall be submitted to and approved in writing by the Local Planning Authority.

No part of the development hereby permitted shall be occupied or use commenced before the approved crime prevention measures are implemented for that plot and retained thereafter.

Reason: To design out crime and promote the well-being in the area and ensure that the development hereby approved is in accordance with Policy 8 of the North Northamptonshire Joint Core Strategy.

13. Prior to the commencement of development of any buildings above slab level within a plot, the details of the boundary treatments for that plot (including details of fences, gates, bollards and turnstiles) shall be submitted to and approved in writing by the Local Planning Authority. This should include a copy of the supplier's technical instructions, showing the type of fence panels and posts being proposed, and the style and locking mechanisms for the gates and turnstiles. The approved details shall be implemented and retained thereafter.

Reason: To ensure that the site is satisfactorily secured in accordance with Policy 8 of the North Northamptonshire Joint Core Strategy.

14. Excluding public highways work, no demolition or construction work (including deliveries to or from the site) shall take place on the site outside the hours of 0800 and 1800 Mondays to Fridays and 0800 and 1300 on Saturdays, and at no times on Sundays or Bank Holidays.

    Outside of the above hours, site start-up and close-down activities will be permitted for a period of 30 minutes at the start and end of the working day, including deliveries, movement of staff and equipment, and washdown, but excluding operation of plant or machinery.

Reason: To ensure the protection of the local amenity throughout construction works.

15. Prior to the commencement of any phase of the development hereby permitted (excluding site clearance and archaeological works), a Construction Environmental Management Plan (CEMP) for that phase shall be submitted to and approved in writing by the Local Planning Authority.

    The CEMP shall have regard to the approved site-wide Construction Environmental Management Plan Framework (CEMPF) of December 2022 and contain the phase specific strategy for managing and mitigating environmental impacts arising from construction.

    The relevant CEMP shall include commitments to satisfactorily manage identified construction impacts on the environment including traffic management, dust management, air quality, noise management, water and utility management, contamination, waste and soil management, and lighting during the construction programme.

    The relevant CEMP should identify when, during the construction programme, works would be undertaken in close proximity (within 150 m) of Receptor R1, as identified in the Noise & Vibration ES Chapter. The LPA must be informed in writing of the number of days on which the threshold level for a significant adverse effect is likely to be exceeded.

The approved CEMP shall be adhered to throughout the construction period and the approved measures shall be retained for the duration of the construction works.

Reason: To limit the detrimental effect of site preparation, demolition and construction works on biodiversity and habitat interests, adjoining business occupiers, and residents of Thrapston and Titchmarsh, by reason of disturbance and nuisance.

16. Prior to the occupation of any building, a scheme for the control of noise and vibration of any plant (including ventilation, refrigeration, and air conditioning) to be used in that building shall be submitted to and approved in writing by the Local Planning Authority. The development of that plot should be carried out in accordance with the approved details. The equipment shall be maintained in a condition so that it does not exceed existing background noise level (determined using the guidance of BS 4142 (BS4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound or any amendments or modifications) whenever it is operating as agreed with the Local Planning Authority. After installation of the approved plant no new plant or ventilation, refrigeration or air conditioning system shall be installed without the written consent of the Local Planning Authority.

Reason: To protect the residential amenity of the locality.

17. Prior to the use of any refrigerated trailers at the site, a noise assessment shall be submitted to and approved in writing by the Local Planning Authority detailing any required mitigation measures. No refrigerated trailers shall operate until the approved mitigation has been installed. The approved measures shall be maintained for the duration of their use.

Reason: To protect the residential amenity of the locality.

18. With the exception of construction, fitting out, marketing and security, there shall be no operational use of Plot 1 until such time as the approved earthworks and landscaping works shown on the Parameters Plan and Phasing Plan are completed to the satisfaction of the Local Planning Authority.

Reason: To protect the residential amenity of the locality.

19. Reserved Matters applications for any plot containing a building shall include a detailed acoustic design report together with mitigation measures which shall be implemented in accordance with an agreed scheme submitted to and approved in writing by the Local Planning Authority. Details shall include but not be limited to the provision of acoustic modelling and details of noise mitigation measures. Noise mitigation measures specified in the approved scheme shall then be carried out in accordance with the approved details and be retained thereafter.

Reason: To protect the residential amenity of the locality.

20. Details of all external lighting for any plot of the development (excluding public highways lighting) shall be submitted to and approved in writing by the Local Planning Authority prior to installation. This information shall include a layout plan with beam orientation and schedule of equipment in the design (luminaire

type; mounting height; aiming angles, luminaire profiles and a lighting contour map). The means of illumination shall not be of a flashing or intermittent nature. The approved scheme shall be installed, retained, maintained and operated in accordance with the approved details.

The lighting strategy shall:

- identify those areas and features on site that are particularly sensitive for bats, lapwings and golden plover and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging.
- show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To protect the amenity of residents of Titchmarsh and Thrapston, the appearance of the area, the environment, wildlife and biodiversity interests, and local light sensitive development from light pollution and to ensure adequate safety and security on site.

21. The development shall not be occupied until the site access has been constructed in accordance with the following approved plan:

    - Site Access General Arrangement: Drawing Ref. LWL/701/001 Rev D7

Reason: In the interests of highways safety.

22. The development shall not be occupied until the off-site highway improvements have been constructed in accordance with the following approved plans:

    - General Arrangement - A14 Junction: Drawing Ref 13 LWL/701/031 Rev D8
    - General Arrangement - A605 improvements: Drawing Ref. LWL/701/021 Rev D7

    The implementation of the off-site highway improvements shall be carried out in accordance with the Phasing Plan to be submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the approved off-site highway improvements and phasing plans.

Reason: In the interests of highways safety.

23. No floorspace shall be occupied (with the exception of occupation for the purposes of construction, fitting out, marketing and security) until the

highways improvements proposed at the A605/Oundle Rd roundabout are completed in general accordance with drawing STN/HGN/SW/DR/C/0102 REV P02.

Reason: In the interests of highways safety.

24. Prior to the commencement of any phase of the development hereby permitted, a Construction Traffic Management Plan shall be submitted to and approved in writing by the Local Planning Authority, for the A14 and A45. The plan shall include as a minimum: construction phasing, construction routing plans, and permitted construction traffic arrival and departure times. Thereafter all construction activity in respect of the development shall be undertaken in full accordance with the approved details.

Reason: To mitigate any severe or unacceptable impact from the development on the A14/A45 in accordance with paragraph 115 of the National Planning Policy Framework (September 2023) and paragraph 50 DfT Circular 01/2022.

25. No building shall be brought into the permitted use until the parking and servicing areas for commercial vehicles, cars, motorcycles, bicycles, and scooters (micro-mobility) and electric vehicle charging points within that plot have been surfaced, laid-out and delivered in accordance with the approved plans for that plot. Parking provision shall be in accordance with the standards as set out in the Northamptonshire Parking Standards, Sept 2016.

Reason: To ensure that the development provides satisfactory on-site parking, servicing, and electric vehicle charging facilities for employees and visitors.

26. Prior to occupation of any building, full engineering, construction, and drainage plans for the construction of a new bus stop as identified on the General Arrangement (Site Access) Drawing Ref. LWL/701/001 Rev D7 shall be submitted to and approved in writing by the Local Planning Authority. The plans submitted under this condition shall be accompanied by a Road Safety Audit (RSA1). The details approved under this condition shall then be implemented prior to the first occupation of the development and retained thereafter.

Reason: In the interests of enhancing sustainable modes of transport to serve the development in accordance with Policies 8 and 15 of the North Northamptonshire Joint Core Strategy.

27. A remedial options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken shall be submitted to and approved in writing by the Local Planning Authority. No development shall take place until the Local Planning Authority has given its written approval of the scheme. This must be conducted in accordance with the Environment Agency's 'Land Contamination Risk Management (LCRM)' (or any procedures revoking or replacing those procedures).

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are prevented and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. In accordance with Policy 11 of the NPPF and Policies 6 & 8 of the North Northamptonshire Joint Core Strategy.

28. Remediation of the site shall be carried out in accordance with the approved remedial option. No deviation shall be made from the approved scheme without the express written agreement of the Local Planning Authority which must be given two weeks written notification of the date of commencement of the remediation scheme works associated with the approved remedial option.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are prevented and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. In accordance with Policy 11 of the NPPF and Policies 6 & 8 of the North Northamptonshire Joint Core Strategy.

29. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are prevented and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. In accordance with Policy 11 of the NPPF and Policies 6 & 8 of the North Northamptonshire Joint Core Strategy.

30. If during development of a plot contamination not previously identified is found to be present at the site, then no further development shall be carried out within that plot until the developer has submitted a remediation strategy to the Local Planning Authority detailing how and when this unsuspected contamination shall be dealt with and written approval of that remediation strategy has been obtained from the Local Planning Authority. The remediation strategy shall be implemented as approved in accordance with the agreed timetable.

    The Remediation Strategy will include measures to ensure that any contamination is appropriately remediated to not give rise to contamination events either within the Site or off the site, including the potential leaching or migration towards watercourse or groundwater sources.

Reason: To ensure that any unforeseen contamination encountered during development is dealt with in an appropriate manner.

31. Foul and surface water shall be drained on separate systems with any potentially contaminated surface water subject to condition 33(f).

Reason: To secure proper drainage and to manage the risk of flooding and pollution.

32. Prior to construction above foundation slab, a scheme for on-site foul water drainage works, including connection point and discharge rate to the public network, shall be submitted to and approved in writing by the Local Planning Authority. The foul drainage scheme shall be implemented as approved prior to first occupation.

Reason: To prevent environmental and amenity problems arising from flooding.

33. Prior to commencement of development, a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved phasing plan and maintained for the lifetime of the development. The scheme to be submitted shall:

    a) Demonstrate that the surface water drainage system(s) are designed in accordance with 'The SUDS Manual', CIRIA Report C753 through the submission of plans and cross sections of all SUDS features.

    b) Limit the discharge rate generated by all rainfall events up to and including the 100 year plus 40% (allowance for climate change) critical rain storm to a peak maximum discharge rate of 3.98 l/s/ha for the site in accordance with the surface water drainage strategy.

    c) Demonstrate detailed design (plans, network details and calculations) of the surface water drainage scheme including details of all attenuation and outfall arrangements.

    d) Calculations should demonstrate the performance of the designed system for the critical storm duration for at least the 1 in 2 year, 1 in 30 year and 1 in 100 year plus climate change return periods. The calculations should be supported by a plan of the drainage network with all manholes and pipes labelled accordingly.

    e) Provide plans and details showing the allowance for exceedance flow and overland flow routing. Water must not be directed toward properties nor flow onto third party land. Overland flow routing should look to reduce the impact of an exceedance event

    f) Demonstrate that measures for the capture and control of liquid hydrocarbons (petrol, diesel and engine oil) are included within the drainage scheme which is informed by calculations identifying the drained catchment area and the type of control feature being used.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, and to improve habitat and amenity.

34. Prior to first occupation, a Verification Report, by a suitably qualified drainage engineer, for the installed surface water drainage system that is based on the approved Flood Risk Assessment, document reference LTP-BWB-ZZ-XX-RP-YE-0002_FRA P02 (BWB December 2021) and the approved Sustainable Drainage Statement Addendum, document reference TN004 (Stantec December 2022), has been submitted to and approved in writing by the Local Planning Authority.

    The details shall include:

    - Any departure from the agreed design is in keeping with the approved principles;
    - Any 'As-Built Drawings' and accompanying photos;

- Results of any performance testing undertaken as a part of the application process (if required / necessary);
- Copies of any statutory approvals, such as land drainage consent for discharges etc.; and
- CCTV confirmation that the system is free from defects, damage and foreign objects.

Reason: To ensure the installed Surface Water Drainage System is satisfactory and in accordance with the approved reports for the development site.

35. No occupation or subsequent use of the development shall take place until a detailed, site-specific drainage maintenance plan is submitted to and approved in wiring by the Local Planning Authority. This shall be implemented as approved and maintained for the lifetime of the development.

    The maintenance plan should:

    - Include plans showing the locations of features requiring maintenance and how these should be accessed; and
    - Provide details on how surface water each relevant feature shall be maintained and managed for the lifetime of the development; and

Reason: To ensure the future maintenance of the sustainable drainage structures through the identification of a responsible party and to allow an operator, who has no prior knowledge of the scheme, to conduct the required routine maintenance.

36. Prior to the commencement of development, a finalised construction environmental management plan for biodiversity (CEMP: Biodiversity) shall be submitted to and approved in writing by the Local Planning Authority, in line with the construction stage mitigation measures identified in the submitted Ecology (including Arboriculture) ES Chapter (Newlands Developments Ltd, December 2021) – prepared by FPCR Ltd.

    The CEMP (Biodiversity) shall include the following:

    - Risk assessment of potentially damaging construction activities;
    - Identification of biodiversity protection zones;
    - Identification of root protection areas according to according to British Standard 5837:2012;
    - Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction, including on root protection areas (may be provided as a set of method statements);
    - The location and timing of sensitive works to avoid harm to biodiversity features and nesting birds;
    - The times during construction when specialist ecologists need to be present on site to oversee work; and
    - Use of protective fences, exclusion barriers and warning signs.

The approved CEMP (Biodiversity) shall be adhered to and implemented through the construction period strictly in accordance with the approved details.

Reason: To conserve protected and priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats and species). This would also allow the identification of responsible persons as well as the role and responsibilities of an ecological clerk of works (ECoW) or similarly competent person.

37. Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected and priority species, prepared by a suitably qualified ecologist, shall be submitted to and approved in writing by the Local Planning Authority.

    The content of the Biodiversity Enhancement Strategy shall include the following:

    - Purpose and conservation objectives for the proposed enhancement measures;
    - Detailed designs or product descriptions to achieve stated objectives;
    - Locations, orientations and heights of proposed enhancement measures by appropriate maps and plans (where relevant);
    - Details of farmland bird enhancement (e.g. skylark habitat creation); and
    - Details of initial aftercare and long-term maintenance (where relevant).

    The works shall be implemented in accordance with the approved details and shall be maintained and managed for the lifetime of the development.

Reason: To enhance protected and priority species and habitats and allow the LPA to discharge its duties under the NPPF and s40 of the NERC Act 2006 (Priority habitats & species) and enable the identification of responsible persons.

38. Prior to the commencement of development, a Skylark Compensation Strategy shall be submitted to and approved in writing by the Local Planning Authority to compensate the loss or displacement of any Farmland Bird territories identified as lost or displaced. This shall include provision of on-site or off-site compensation in nearby agricultural land, prior to commencement.

    The content of the Skylark Compensation Strategy shall include the following:

    - Purpose and conservation objectives for the proposed compensation measure e.g. skylark plots;
    - Detailed methodology for the compensation measures;
    - Locations of the compensation measures by appropriate maps and/or plans; and
    - Persons responsible for implementing the compensation measure.

The Skylark Compensation Strategy shall be implemented in accordance with the approved details and all features shall be retained and managed for a minimum of 30 years.

Reason: To allow the LPA to discharge its duties under the NERC Act 2006 (Priority habitats and species).

39. The development shall create a vegetative bat corridor, and plant and enhance lengths of hedgerow in accordance with a bat mitigation plan to be submitted to and approved in writing by the Local Planning Authority. This shall include details of the persons responsible for implementing and managing the mitigation plan. Hedgerows identified on this plan shall be planted and enhanced in the first appropriate season after development commences. The bat corridor is to be planted in the first appropriate season after site levels have been established. Both bat corridor and hedgerow creation and enhancements are to be appropriately maintained for the lifetime of the development.

Reason: To ensure that bats and their habitats are satisfactorily protected throughout the construction period of the development and to allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats and species).

40. Prior to any works above slab level, a 30 Year Landscape and Ecological Management and Monitoring Plan (LEMMP) for the site shall be submitted to and approved in writing by the Local Planning Authority. The approved LEMMP shall be strictly adhered to and implemented in full for its duration and shall contain the following:

    - Description and evaluation of features to be managed;
    - Ecological trends and constraints on site that might influence management;
    - Aims and objectives of management sufficient to attain both target biodiversity values and BREEAM sustainability goals;
    - Appropriate management options for achieving aims and objectives;
    - Prescriptions for management actions;
    - Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
    - Details of the body or organization responsible for implementation of the plan;
    - Mechanisms of adaptive management to account for necessary changes in work schedule to achieve the required targets; and
    - Reporting and monitoring to the local planning authority on year 2, 5, 10, 20 and 30 following the implementation of habitat creation, with biodiversity reconciliation calculations at each stage.

Reason: To ensure the longevity of the landscaping scheme, to enhance biodiversity, to ensure that sustainability goals are met, and protect the visual amenity and character of the area.

41. All buildings delivered pursuant to this planning permission (whether approved in detail or as a subsequent Reserved Matters application) shall achieve a 'Excellent' rating under BREEAM 2018 Shell-and-Core Criteria' (or such equivalent standard that replaces this) as a minimum.

    Prior to first occupation of each plot, an Interim BREEAM Progress Report with a target of achieving an 'Excellent' rating for that plot shall be submitted to and approved in writing by the Local Planning Authority. Following this, within 12 months of the first occupation of each plot, submission of evidence to BRE to support provision of a BREEAM Shell and Core post-construction certificate (or such equivalent standard that replaces this) issued by the BRE must be submitted to and approved in writing by the Local Planning Authority to demonstrate that a minimum 'Excellent' Rating has been achieved.

Reason: To ensure sustainable construction and reduce carbon emissions in line with Policy 9 of the North Northamptonshire Joint Core Strategy, and in accordance with government guidance contained within the National Planning Policy Framework.

42. No development shall take place within, or within 10 m of the identified areas of archaeological interest until a programme of archaeological work has been implemented in accordance with an approved Written Scheme of Investigation (WSI), updated from the previously agreed WSI (December 2022) to include the areas shown on Plan 'Areas of Archaeological Mitigation' HRT-PHP-01-XX-DR-A-4432-107-P01. Completion of each of the following will trigger the phased discharging of the condition:

    a) Fieldwork in accordance with the agreed WSI.

    b) Completion of a Post-Excavation Assessment report and approval by the Local Planning Authority of an approved Updated Project Design: to be submitted within six months of the completion of fieldwork, unless otherwise agreed in advance with the Local Planning Authority.

    c) No development shall take place within or within 10m of the identified areas of archaeological interest until the Local Planning Authority has established the quality and historic importance of the remains, before determining the best way forward for the future protection of the remains to include:

        - retention in situ, recovering with material and protective fencing and information board, or

        - retrieval of all remains and removal to storage and or display

    d) Within two years of the completion of fieldwork, determination of the preferred way forward, completion of the analysis, preparation of site archive ready for deposition at a store (Northamptonshire ARC) approved by the Local Planning Authority, production of an archive report, and

submission of a publication report must be completed, unless otherwise agreed in advance with the Planning Authority.

Reason: To ensure that features of archaeological interest are properly assessed as to their importance, into the future by retention in situ or examined and recorded and the results made available, in accordance with NPPF Paragraph 205.

43. Prior to the commencement of development of any buildings above slab level within a plot, a Local Employment Strategy relating to the construction phase has been submitted to and approved in writing by the Local Planning Authority. The strategy shall include detail of the local labour and employment opportunities and initiatives and construction skills training associated with the development, which actively promotes jobs to the local workforce.

Reason: To ensure that features of archaeological interest are properly examined and recorded and the results made available, in accordance with NPPF Paragraph 205.

44. Prior to first occupation of the development an End User Employment and Skills Plan (ESP) shall be submitted to and approved in writing by the Local Planning Authority. The ESP shall include details of the skills and training opportunities associated with the end user phase of development to actively promote jobs to the local workforce. The development shall be implemented in accordance with the approved details.

Reason: To promote employment opportunities to local residents in accordance with Policy 22 of the JCS.

45. Within 3 months of first occupation of each unit hereby permitted (with the exception of occupation for the purposes of construction, fitting out, marketing and security), a detailed Travel Plan for each development plot (including details of the Travel Plan Co-ordinator and actions and measures, with quantifiable outputs and outcome targets), and in accordance with the approved Land East of Halden's Parkway Thrapston Travel Plan (prepared by Lawrence Walker Ltd, January 2022), shall be submitted to and approved in writing by the Local Planning Authority. Each unit shall thereafter be occupied in accordance with the approved Travel Plan or any amended detailed Travel Plan for that building first submitted to and agreed in writing by the local planning Authority.

Reason: to provide sustainable transport measures for visitors and staff and to ensure that the impact of the proposal on the free and safe flow of traffic on the highway is kept to a minimum.

46. Prior to occupation of any unit hereby permitted, an Operational Management Plan (OMP) shall be submitted to and agreed in writing by the Local Planning Authority. The OMP will include, but not limited to, the following:

    - Details of HGV routing;
    - Measures to manage HGV movements during peak periods (Monday-Friday AM Peak (0800-0900) and PM Peak (1630-1800));
    - Details of staff shift changes which seek to minimise the effect during peak operational periods of the surrounding highway network;

- Signage Strategy; and
- Car Park Management Plan.

All agreed measures shall be implemented as approved and maintained for the lifetime of the development.

Reason: in the interest of highway safety, to ensure that the impact of the proposal on the identified routes is kept to a minimum and to ensure adequate off-street parking provision at all times so that the development does not prejudice the free flow of traffic or the conditions of general safety along the adjacent highway, or the amenities and convenience of existing local residents.

APPENDIX 10
DRAFT MARKET NEEDS ASSESSMENT

Tritax Park, Cambridge
Market Report
9th October 2025

BIDWELLS

TRITAX PARK, CAMBRIDGE

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TRITAX BIG BOX DEVELOPMENTS CASE STUDIES

Executive Summary

- Tritax Park, Cambridge is situated to the north-west of Junction 25 at Bar Hill and extends to approximately 123 ha (the 'Site'). It is envisaged that the Site would accommodate in the region of 2.5 million sq ft of E(g), B2 and B8 commercial accommodation, together with alternative uses and incorporating considerable areas of parkland and community space;

- There is a severe shortage of good-quality industrial and logistics stock, combined with limited deliverable land for development within Greater Cambridge (referred to as the 'immediate market') and the wider industrial and logistics market (referred to as the 'regional market');

- There is only one site of 32 acres (Lancaster Way, Ely) with outline planning consent for both B2 and B8 uses currently available in Cambridge and a 20 mile radius for occupiers seeking space of more than 100,000 sq ft;

- There are only four existing units larger than 100,000 sq ft available in Cambridgeshire currently, two of which are now under offer, leaving only approximately 500,000 sq ft available across two buildings, both located in Peterborough. Only one of these is a Grade A (best-in-class & modern) unit;

- Cambridge lags behind other major regional commercial centres such as Peterborough, Huntingdon, Bury St Edmunds and Ipswich in its stock of industrial units and the shortage fails to support forecasted economic growth;[1]

- Supply of industrial floor space in Cambridge remains at a very low level of just over 300,000 sq ft on the market at the end of 2024. This represents a vacancy rate of just 3.5%, less than half that of the UK-wide vacancy figure;

- We have highlighted nearly 13 million sq ft of active demand in the general area of Bar Hill and along the A14 corridor. Focusing on Cambridge specifically, the demand for industrial and logistics floor space far outstrips supply, with the majority of requirements seeking buildings of 50,000 sq ft and above. On this basis, the previously identified need for industrial and warehouse employment land to accommodate only 200,000 sq m (2.15 million sq ft) is wholly inadequate;[2]

- Iceni's more recent report on *Greater Cambridge Warehouse and Industrial Space Needs* (March 2025), has identified a need for a further 317,000 sq m (3.4 million sq ft) of industrial and warehouse space in the Local Plan for Greater Cambridge over the next c.15 years, a significant increase on the previously identified figure. On this basis, a further allocation of 80 hectares (c.200 acres) of industrial land allocation will be required to satisfy the need. Irrespective of this, we believe this still falls short of satisfying the demand from occupiers in the immediate and regional markets, based on long-term average annual take-up figures of 375,000 sq ft (local) and 1.5 million sq ft (regional) respectively, particularly considering that

[1] Source: Bidwells Research

[2] Report by Greater Cambridge Employment and Housing Evidence Update 2023 (EHEU)

take-up in the immediate market will also have been restrained by lack of supply over the past 10 years.

- There is currently approximately 2.5 million sq ft of demand for larger buildings from occupiers already located within Cambridge or from those who have Cambridge-specific requirements, as set out in Section 4 of this report. Many of these occupiers have been seeking sites and/or buildings to expand their business which have been thriving during the previous three to four years. However, due to the lack of allocated employment land for sizeable buildings, they are being stifled in their growth aspirations and are being forced to consider land and sites away from Cambridge, taking with them highly skilled jobs and economic opportunity;

- To accommodate this existing 2.5m sq ft of demand in Greater Cambridge, it will require approximately 140 acres (56 ha) to be satisfied, assuming a standard building site coverage of 40% per plot. To accommodate the next 15 years of demand, further significant allocations of land will be needed, as identified by Iceni's report.

- There are currently no significant sites available with a B8 allocation in Greater Cambridge and as such, there is insufficient land with outline planning permission to meet current and future demand from business.

- The Greater Cambridge planning policy is focused on the provision of new housing, with the local plans allocating a number of major existing industrial estates for future residential. A total of approximately 1.3 million sq ft of occupied employment land in Cambridge City is allocated for residential development in the Cambridge Local Plan 2018, with further sites such as Dales Manor and Unity Campus in Sawston (Greater Cambridge) also allocated for alternative uses. Displacement of commercial occupiers has already begun, with 94,000 sq ft of industrial land being repurposed for residential or other uses, and a further 333,000 sq ft set to be redeveloped in the next two to three years;

Conclusions

- Considering the large size and scale of the Site and its location immediately adjacent to the strategic highway network, Bar Hill, Northstowe and Waterbeach, there is a significant opportunity to create new employment floorspace to meet current and predicted future demands, catering for a diverse range of occupier requirements. This has clearly been demonstrated by Tritax who have a deal provisionally agreed with DPD to deliver a new 63,000 sq ft last-mile delivery hub on this site;

- The land offers a deliverable opportunity to attract investment from large employers, to deliver significant benefits to the local economy and to support the proposed future economic growth of the area;

- The large scale of the development site requires a long-term commitment to ensure the scheme attracts short and medium-term investment which acts as a catalyst to attracting future employers into the locality and provides opportunities for local employers to move out of the centre of Cambridge;

- The inward investment potential for South Cambridgeshire District Council is considerable. Tritax Park will drive local and sub-regional economic growth by providing 2,500 to 3,000 on site, skilled jobs. The scheme will generate gross value added to the local economy of up to

£150 million million each year, along with business rates of around £12-£15 million per annum once Tritax Park is fully operational.

- Proposals for an employment hub at Bar Hill are therefore complementary to the current supply of land and premises in Greater Cambridge and will not prejudice the delivery of any other site. We strongly believe that the Site would be a valuable addition to the depleted portfolio.

1.0 Introduction

1.1 Bidwells has been asked to consider the market need for employment development at Tritax Park, Cambridge which is adjacent to J25 at Bar Hill, close to Cambridge. This report examines the demand and supply dynamics of the commercial market in a national, regional and local context.

1.2 The subject site extends to approximately 123 ha (304 acres) at a strategic location directly adjacent to the A14. The A14 corridor is the main road connection linking Felixstowe to the Midlands and ultimately, to the rest of the UK, with the section immediately to the west of this site benefitting from a major £1.8 billion infrastructure upgrade. Location and site plans are included at Appendix 1.

1.3 The Site could accommodate approximately 2.5 million sq ft (232,000 sq m) of new E(g)/B2/B8 employment space to meet both the local and wider regional occupier demand in a range of different unit sizes. It is likely that the Site, due to its scale, will contain units with larger floor plates in order to assist with the funding of the upfront infrastructure required to deliver a site of this scale and to ensure viability. However, a mixed range of sizes and uses is envisaged as it becomes established.

1.4 The purpose of this report is to advise as to the level of demand from commercial occupiers and how they could be accommodated on the supply side by land within Greater Cambridge and the associated industrial and logistics market (as defined in Section 4.0). The report demonstrates that the subject site has the potential to:

- Maximise the investment opportunity provided by the key strategic location adjacent to the A14, at the top of the M11 and connecting to the A1(M);
- Maximise the benefits of future public and private sector investment in this location and along the Oxford to Cambridge corridor (also referred to as the 'OxCam Arc');
- Meet the acknowledged need for accommodation for supply chain companies, last-mile delivery and to attract UK manufacturers;
- Meet the significant levels of demand for high-quality employment floorspace in the wider region along the A14 and A1 corridors, attracting new investment to Greater Cambridge and expanding upon growth already seen;
- Address the under-supply of land and premises in the immediate Cambridge area, particularly from occupiers who may be displaced from City Centre employment locations on sites due to be adopted for housing in the future.

1.5 The remainder of this report is set out as follows:

- National logistics and industrial market context and trends;

- The market need for the site is considered, including an assessment of the demand for, and supply of, similar land and premises which may compete with the subject site. This section also includes a review of the existing portfolio of strategic employment land within Greater Cambridge and immediate surrounds; and

- Summary and conclusions.

2.0 UK Industrial and warehouse market

2.1 This section reviews the market dynamics for industrial and warehousing units of 9,295 sq m/100,000 sq ft and above at a national and regional/local level. The statistics used include industrial (E(g) / B2) and warehouse/storage and distribution (B8) uses.

2.2 At the time of writing, the overall economic situation in the UK remains unpredictable in the face of global uncertainty. Inflation (CPI) is now trending around 3.6%, somewhat above the Government's target rate of 2.0%, and is up from 3.0% at the beginning of the year. However, it has reduced significantly since its peak of 11.1% in October 2022. On the back of this, the Bank of England has continued to cut interest rates to the current level of 4.25%. Rates have been cut by 1 percentage point overall since August 2024.

2.3 After strong gross domestic product (GDP) growth in the first quarter of 2025, the UK economy looks set to grow more slowly over the rest of the year. Nevertheless, some indicators tentatively point to economic conditions improving in the past couple of months.

2.4 GDP in April fell by 0.3% compared with the previous month, following growth of 0.2% in March and 0.5% in February. The decline in April was mostly a result of a 0.4% decline in the services sector, which accounts for around 80% of GDP. Other indicators also point to GDP growth slowing during the second quarter, following a strong gain of 0.7% in the first quarter. For instance, the closely watched Purchasing Managers' Index produced by S&P Global showed sluggish growth in business activity in May and June, following a dip in April. The Bank of England thinks that quarterly GDP growth is likely to slow to around 0.25% in the second quarter of 2025, which is slightly higher than it had previously been expecting. This is similar to a projection of 0.3% made by the National Institute of Economic and Social Research think tank.[3]

2.5 Despite the large degree of uncertainty surrounding global developments and how they might affect the UK, not all economic indicators point to deteriorating economic conditions. Some recent surveys of businesses and consumers suggest that confidence has risen recently. The Lloyds Bank business barometer, a survey of UK companies, showed some improved confidence among firms in May, more than making up for the decline seen in April. Notably, May's reading was the highest in nine months, reflecting improved economic optimism among businesses. Similarly, the GfK consumer confidence barometer, a prominent measure of the economic mood of households, improved for the second consecutive month in June. Confidence is still lower than a year ago, but there have been improvements in consumers' expectations for their own personal finances and the general economic situation over the next 12 months.

[3] House of Commons Library: Economic indicators: Key statistics for the UK economy, 27 June 2025

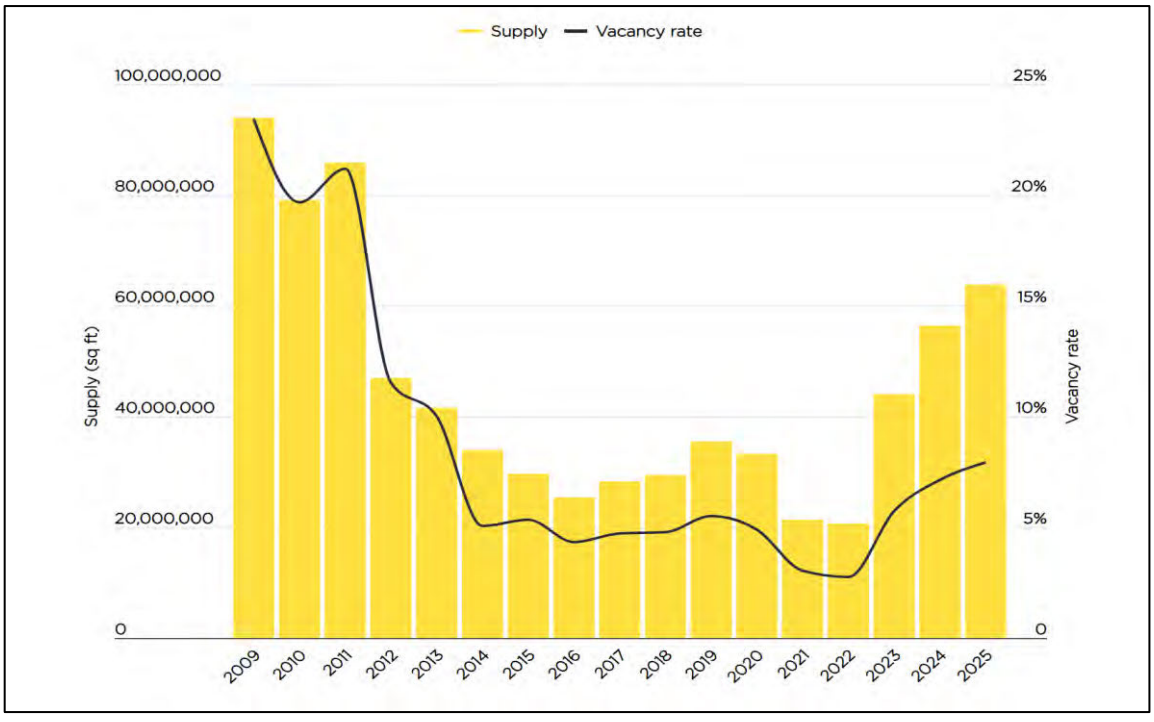
2.6 In terms of retail sales, volumes (quantity bought) are estimated to have risen by 0.9% in June 2025, following a fall of 2.8% in May 2025. Food store sales rose following a fall in May 2025, with retailers reporting that the warm weather had a positive effect. More broadly, sales volumes rose by 0.2% in Quarter 2 (April to June) 2025 when compared with Quarter 1 (January to March) 2025.[4]

2.7 National Market Context – Supply

2.7.1 Across the whole of the UK, the supply of vacant existing units over 100,000 sq ft (9,295 sq. m) currently stands at approximately 64 million sq ft, reflecting a vacancy rate of 7.9%, approximately 1.0% higher than at the same point last year. The first half of 2025 has seen 10.30 million sq ft of speculative completions and an additional 5.95 million sq ft of second-hand space come to the market since year-end 2024[5]. The current vacancy rate is somewhat higher than the pre-Covid average of 6.3%.

2.7.2 It is expected that this will start trending downwards as current supply is acquired and the development pipeline is not replenished as quickly. There is c.9 million sq ft in the development pipeline for delivery in 2025 and 2026.

2.7.3 UK Supply of vacant floorspace (units over 100,000 sq ft)



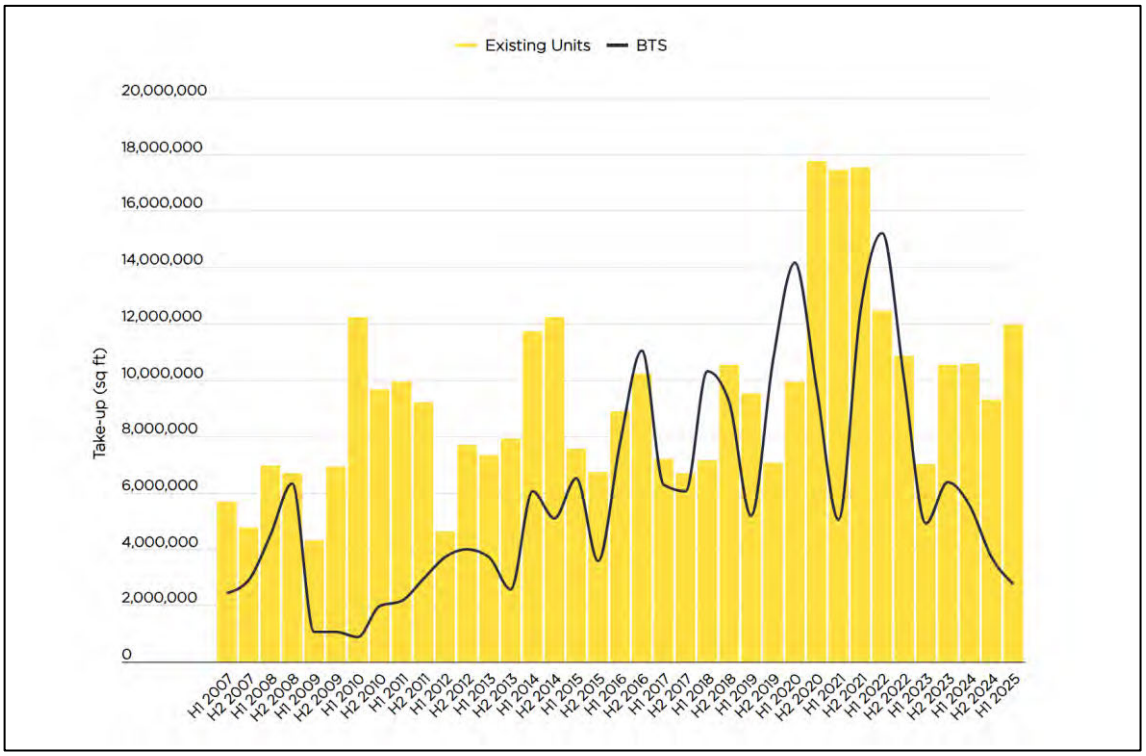
Source: Savills Research

[4] Office for National Statistics: Retail Sales, GB: June 2025
[5] Savills Research

2.8 UK National take-up

After a slower-than-anticipated first quarter of 2025, an improved Q2 saw total take-up for the first half of 2025 reach 14.71 million sq ft. This is a rise of 13% when compared with the area of space transacted in the second half of 2024, when take-up reached 13 million sq ft. Take-up for 2024 reached approximately 28 million sq ft, reflecting a modest 1% rise year on year, but 8.0% above the pre-Covid average.

2.8.1 UK Take-up (units over 100,000 sq ft)



Source: Savills Research

2.8.2 Occupiers' flight-to-prime strategy remains a focal point, especially for major corporations. Flight-to-prime is a key theme of the market as efficiency savings and ESG requirements are increasingly becoming key must-haves from a wider range of occupiers, particularly for global businesses which can amortise costs over a longer period of time.

2.9 Occupier mix

2.9.1 After a quieter period, on-line demand has increased, with e-commerce occupiers accounting for 15.2% of total take-up in H1 2025, the second highest six-monthly share since the pandemic. Third party logistics providers (3PLs) took the most space in the same period, resulting in a share of 37.5%. They were followed by manufacturers, recording a 23.4% market share, with retail/wholesale and others accounting for 16.7% and 7.0% respectively. This is a clear sign that some of the household names in the e-commerce sector are gearing up for a busy 2025 and 2026.

2.9.2 Some significant deals were completed in H1 2025 including: Amazon taking 1 million sq ft at Tritax's Symmetry Park, Kettering; GXO taking 885,000 sq ft at Panattoni Park, Avonmouth, JD.com committing to c.530,000 sq ft at PLP, Milton Keynes and Reedbutt taking c.100,000 sq ft at Cube, Milton Keynes.. This was on the back of some significant deals agreed in 2024, with Yusen Logistics committing to a new 1.2 million sq ft unit at Segro Logistics Park, Northampton; Nike committing to a new 1.3 million sq ft campus-style unit at Magna Park, Corby; Bleckmann taking a c.600,000 sq ft speculatively developed unit at Magna Park, Corby, Greggs' pre-letting c.500,000 sq ft at SmartParc SEGRO, Derby; Warburtons pre-letting 65,000 sq ft at Symmetry Park, Biggleswade; Delta Group taking 115,000 sq ft at Spark Park, Bishop's Stortford and Sizewell C taking over 1 million sq ft at Orwell Logistics Park, Ipswich.

2.9.3 Occupier demand for logistics space is increasingly wide-ranging, with take-up coming from a diverse range of occupiers including; Third party logistics (3PLs) (companies that offer outsourced supply chain and logistics services to other businesses, handling functions such as warehousing and transportation) retailers, manufacturers and supermarkets, but also other less traditional logistics occupiers such as data centres and motor trade.

2.9.4 Although take-up from e-commerce occupiers has increased this year, it is down significantly from 2021 where they dominated the sector. This has fallen in line with a reduction of internet sales as a percentage of total retail sales, from a high of 37.8% in January 2021 (peak Covid), to the current ratio of 26.5% (as of June 2025), although the general trend is an upwards trajectory year on year post the Covid reset.

2.9.5 As mentioned, 3PLs continue to dominate the take-up, significantly exceeding any other sector type. The move to 3PLs is being driven by a number of factors including; occupiers outsourcing their supply chain to achieve greater flexibility, difficulties in sourcing labour and increasing transport costs. Furthermore, on-going supply chain disruptions are pushing occupiers across the retail and manufacturing sectors to increase their stock profile and increase near-shoring. This is leading to an increased reliance on 3PLs as occupiers do not have the necessary infrastructure to deal with increased levels of stock.

2.10 Demand trends

2.10.1 In the industrial and logistics sector there are a range of factors which combine to determine the occupier's choice of location, including:

- The availability of suitable buildings and land (noting a 100,000 sq ft building requires a minimum of 5 acres plus access and wider estate roads which could take this to c. 20 acres);
- The diversity of routes available from a location and congestion;
- The availability of labour and power, particularly for manufacturers;
- Reliability of the transport solution (and available alternatives);
- The growth in carbon taxes;
- Social responsibility and corporate governance.

2.10.2 The ability to hold, consolidate and distribute goods in HGV-size loads from one location is the most efficient method of organising supply chains for manufacturers, hence the development of both national distribution centres (NDCs) and regional distribution centres (RDCs). This is not only in terms of pure costs – consolidating and distributing 'mixed loads' results in fewer HGV journeys

being required, resulting in environmental benefits. Furthermore, with more and more occupiers changing to electric/hybrid delivery methods, this is only heightened.

2.10.3 Manufacturers make up an important component of the sector. They are more likely to store and distribute goods to suppliers or retailers direct from a production site. However, some manufacturers do occupy distribution centres where there is limited space on site or where they have a number of factories and there are benefits to consolidating storage. In addition, some manufacturers locate their storage facilities close to their customers, in order to meet their strict just-in-time delivery arrangements, particularly in the automotive industry.

2.11 Implications for the property market

2.11.1 The continuing shift away from manufacturer/suppliers delivering direct to their customers has seen a rise in the average size of buildings and has led to an increase in plot sizes necessary to accommodate them. Since the beginning of the pandemic, we have seen take-up of extra-large warehouses (over 250,000 sq ft) and large warehouses (over 100,000 sq ft) increase significantly, demonstrated by those transactions identified in paragraph 3.9.2. which have been completed in 2024 and the first half of 2025.

2.11.2 The long-term trend has been an increase in eaves heights provided to allow greater occupier flexibility and numbers of loading doors for greater efficiency. Specifically, greater eaves heights allow for increased racking capacity. More recently, an increase in height has been driven by the e-commerce sector and the need to install mezzanine floors to aid storage and human stock picking meaning more efficient use of the buildings.

2.11.3 Clearly this also has a direct impact on the size of overall schemes capable of accepting these larger buildings and the speed at which sites are taken up.

2.11.4 Implications for the property market include:

- A significantly increased demand for employment land and floorspace which can meet the needs of the online retail sector, i.e. large, well-located sites which allow the construction of bespoke units and enable occupiers to achieve the fastest possible fulfilment times;
- A significant proportion of demand is now for larger units and plot sizes. Consequently, a direct impact on the size of overall schemes capable of accepting these larger buildings and the speed at which sites are taken-up;
- A choice of sites is needed which can accommodate a range of bespoke requirements in terms of location, scale and configuration of unit;
- Larger buildings, in the most part, will create more jobs and therefore, access to a strong labour pool is essential;
- The vast majority of the large corporations and larger businesses are driven by sustainability and ESG targets and a need to improve staff wellbeing and in turn, staff retention. On this basis, there is a flight towards high-quality, sustainable and modern warehouse premises on well-appointed industrial parks;

- In order to maximise the economic potential of the logistics sector, it is essential to provide the appropriate accommodation and sites to deliver the required accommodation.

3.0 Greater Cambridge regional and local industrial market

3.1 Defining the markets

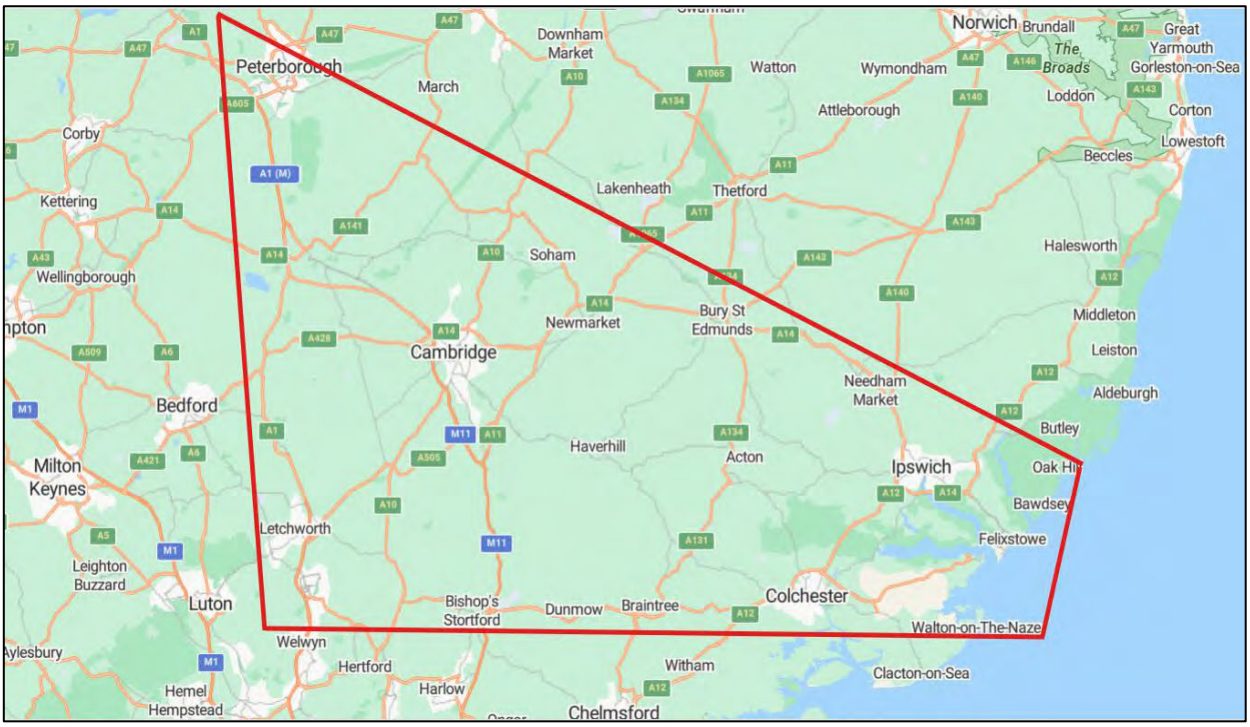
3.1.1 Tritax Park, Cambridge could suitably accommodate the growing trend for larger, single units for the burgeoning industrial, logistics, advanced manufacturing and technology sectors. This section focuses on and addresses the local and regional market, analysing the current supply of existing units and sites capable of accommodating units as proposed.

3.1.2 We have focused on the areas where a likely occupier would consider if seeking representation within the area. Larger occupiers who do not already have a base within the area generally are more footloose when selecting a location, whereas existing Greater Cambridge occupiers, for example, would look to remain in Greater Cambridge plus 10 to 15 miles due to staff retention.

3.1.3 For the purposes of this assessment, we review the demand/supply position across the 'immediate property market', which is the market in Greater Cambridge expanding to 20 miles.

3.1.4 However, it should be noted that the Site also relates to a wider market due to its characteristics and potential to accommodate strategic logistics need. In particular, the 'regional market' of the Site includes an area bounded by Peterborough to the north, Bishop's Stortford to the south, St Neots and Huntingdon to the west and Felixstowe to the east. This area is generally defined by the A1(M), A14 and M11 corridors (see plan overleaf).

3.1.5 Based on the occupiers' requirements and live enquiries currently in our database, we consider the wider property market associated with Bar Hill to extend from Peterborough to Felixstowe across the A14 Freight Corridor and other trunk road corridors mentioned above. As mentioned in earlier sections, large manufacturers have a wide geographical search area and are often footloose. They will choose to locate where their search criteria are best satisfied, and buildings are deliverable. Additionally, logistics operators are seeking reconfiguration of their supply chains in response to Brexit and the global pandemic, increasingly seeking local delivery centres and hubs to serve majors towns and cities.



3.1.6 The southeast as a region is a key occupational market with the long-term average take-up amounting to the highest for any UK region. However, Cambridgeshire to the east lags behind its neighbouring counties in terms of provision of industrial floor space and employment land and is chronically undersupplied when compared to demand.

3.1.7 The impact of the port of Felixstowe is very significant on the wider region. Felixstowe is the UK's biggest and busiest container port and one of the largest in Europe. The port handles more than 4million TEUs (Twenty-foot Equivalent Units) and welcomes approximately 2,000 ships each year, including the largest container vessels afloat today. Approximately 17 shipping lines operate from Felixstowe to and from over 700 ports around the world.[6]

3.1.8 Felixstowe has recently been awarded Freeport status, along with Harwich port, and will provide businesses investing in the area with various tax deductions, capital allowances and relief on business rates and national insurance contributions. This is expected to generate a Gross Value Added of £5.5 billion over the next 10 years.

3.1.9 Within the vicinity of the port, the A14 carries approximately 36,668 vehicles per day, of which approximately 7,000 (18.6%) are HGVs.[7] It is expected that the numbers of HGVs will increase over the coming years, driven by investment in the area.

3.1.10 Traditionally, 70% of containers coming through Felixstowe have been delivered to what is known as the 'Golden Triangle', a region in central UK where many of the country's main high street and online retailers have their national distribution centres. However, we are now seeing a shift in this pattern and businesses are looking to offload containers locally.

[6] Source: Hutchison Ports

[7] Source: Royal Haskoning DHV

3.1.11 A prime example of this can be seen with the success of Suffolk Park, Bury St Edmunds and Gateway 14, Stowmarket, where Belgian logistics company, Weerts, developed an 870,000 sq ft warehouse, joining Chinese consumer goods importer, MH Star, who took occupation of 206,000 sq ft in mid-2020. More recently, brewing giant Greene King has taken nearly 300,000 sq ft at Suffolk Park and retailer, The Range, purchased a 1.17 million sq ft D&B distribution unit at Stowmarket to support the expansion of their retail network and website in the UK.

3.2 Current Available Units > 100,000 sq ft in the Regional Market

3.2.1 There are currently a number of existing buildings available larger than 100,000 sq ft within the regional market (see following table), although these vary greatly in quality and only two can be considered to be modern, Grade A standard:

IMAGE	UNIT	COUNTY	GRADE	SIZE (SQ FT)	QUOTING RENT (PSF)
	Novus, Gateway Peterborough	Cambridgeshire	A	387,259	£9.50
	Unit 1, The Broadlands Newark Road Peterborough	Cambridgeshire	B	108,903	£6.50
	Crossdock 252, Stukeley Meadows Ind. Est. Huntingdon	Cambridgeshire	B	251,746	Under offer
	Units 4, 5 & 6, Elean Business Park, Sutton, Ely, Cambridge	Cambridgeshire	B	167,793	Under offer
	Shepherd's Grove IE, Stanton, Bury St Edmunds	Suffolk	C	395,000	£4.50
	Mendlesham Industrial Estate, Mendlesham, Suffolk	Suffolk	C	130,000	£4.50

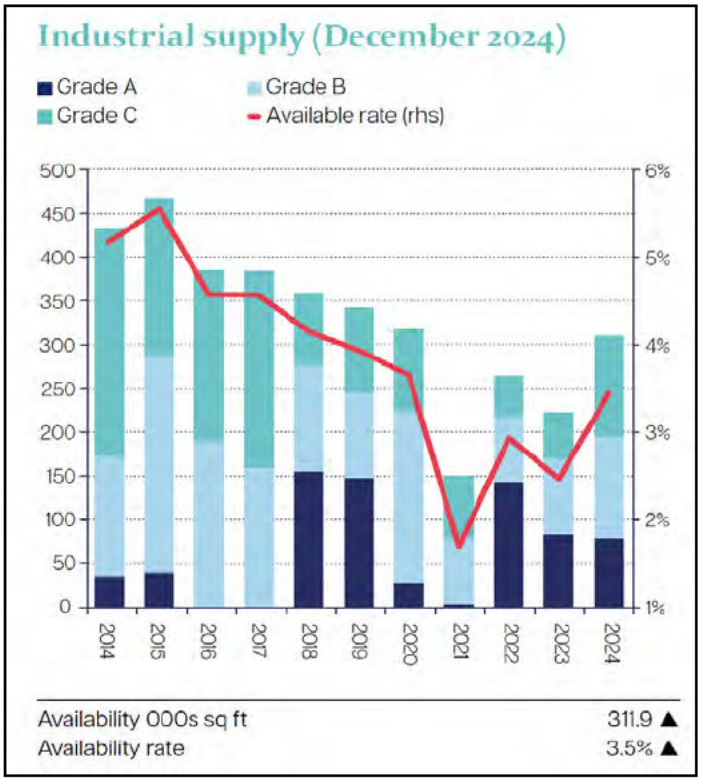
IMAGE	UNIT	COUNTY	GRADE	SIZE (SQ FT)	QUOTING RENT (PSF)
	Unit 11 Port One Logistics Park, Great Blakenham Ipswich	Suffolk	A	219,160	£10.00
	Harris Way, Ipswich	Suffolk	B	215,073	£9.00
	Gb200, Addison Way, Orion Business Park, Ipswich	Suffolk	B	203,004	£9.25
Total	**2,077,938 sq ft**				

3.3 As per the table above, there are only four existing units above 100,000 sq ft available in Cambridgeshire currently, two of which are now under offer, leaving only approximately 500,000 sq ft available across two buildings. Only one of these is a Grade A, modern unit, which highlights the shortage of quality, modern, sustainable space in the region for occupiers to consider. The other units can be considered Grade B (second-hand and more than five years old) or Grade C (second hand and much older).

3.4 Given the current economic uncertainty and the correction in the industrial investment market, developers are being more cautious in their decision-making in relation to speculatively building. A number of sites are now unlikely to be developed out without pre-lets or pre-sales in place where they would have been two or three years' ago. Ultimately, this will impact supply and once the existing units are taken out of the market over the coming months, it will leave very limited choice for occupiers seeking a facility, particularly those seeking a large, modern facility in Cambridgeshire. This will create a push factor for Cambridge businesses who may move out of the area in order to accommodate their requirements.

Immediate Market

3.4.1 Focusing on Cambridge and a 10 mile radius, the supply of industrial floor space has increased slightly over the last 12 months to c.300,000 sq ft to the end of 2024 but remains at a very low rate of just 3.5%, highlighting the enduring shortage of accommodation. Two new schemes at Accelerator Park, Sawston (c.81,000 sq ft) and Phase 2 at Bourn Quarter, Bourn (c.137,000 sq ft) have brought forward much-needed stock over the past six months, albeit these are smaller unit schemes (8,000 to 30,000 sq ft) and are targeted at the "Mid-Tech" market, rather than the traditional industrial warehouse market. As such, quoting rents are significantly higher at between £20 to £25 per sq ft. The following graph shows the level of industrial supply in Cambridge and a 10 mile radius over the past 10 years:



Source: *Bidwells Research*

3.4.2 The availability of land with outline consent for E(g), B2 and B8 in a regional context is also severely restricted, particularly around Greater Cambridge. The table below illustrates the limited options for immediate future employment development within the immediate market. This shows sites larger than 10 acres (4 ha) with outline planning consent for E(g), B2 and B8:

SITE	PLANNING STATUS	SIZE	CURRENT POSITION
Cambridge			
No sites available.			
Huntingdon			
Alconbury Weald, Huntingdon	Outline consent secured for mix of E(g) and B2 uses. No B8 consent.	50 acres (20 ha)	Key phase 3 coming online in 2025. Could deliver approx. 900,000 sq ft. on a BTS basis. Unlikely to build spec.
Peterborough			
Flagship Park, Edgerley Drain Road, Eastern Industry, Peterborough, PE1 5YG	Outline consent secured to deliver a wide range of industrial accommodation (E(g)/B2/B8) of up to 1.2m sq ft.	127 acres (51 ha)	Available. 1.2m sq ft remaining. Not deliverable until 2028 at earliest.