

APPLICATION - CONSULTATION RESPONSE

Consultee:	Urban Design
Reference Number:	23/03204/OUT
Proposal:	Outline application (with all matters reserved) for the demolition of existing buildings and structures and redevelopment of the site for a new local centre (E (a-f), F1(b-f), F2(b,d)), open space and employment (office and laboratory) floorspace (E(g)(i)(ii) to the ground floor and employment floorspace (office and laboratory) (E(g)(i)(ii) to the upper floors, along with supporting infrastructure, including pedestrian and cycle routes, vehicular access, car and cycle parking, servicing areas, landscaping and utilities. (The Development is the subject of an Environmental Impact Assessment)
Site Address:	Beehive Centre, Coldhams Lane, Cambridge
Case Officer:	Cuma Ahmet
Responding Officer:	Sarah Chubb
Date:	25.10.24

- ☐ No objection
- ☒ Further amendments are required
- ☐ Object for the following reasons:

Documents Reviewed

- Updated Parameter Plans and illustrative masterplan
- Design and Access Statement Addendum, August 2024 by Leonard Architects
- Updated Design Code, August 2024 by Leonard Architects
- Environmental Statement Addendum, August 2024
- Updated Public Art Strategy, August 2024
- The Beehive Masterplan Outline Wayfinding Strategy, August 2024

Suggested Conditions	Code
Design Code All reserved matters applications must be in accordance with the approved design code and shall include a Design Code Checklist to demonstrate compliance.	Bespoke
Cycle Parking	Bespoke

Any reserved matters application shall include details of facilities for the covered, secure and integrated parking of bicycles and demonstrate that the provision is in accordance with the design code.	
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Background information

Urban Design objected to the original application, raising fundamental concerns in relation to the excessive amount of development and how this was manifesting in a series of key issues, which were set out in detail in our previous comments dated 09.11.23. We considered the previous proposal would create unacceptable harm on the skyline of the city and local townscape, uncomfortable transitions between existing buildings and edges, a highway dominated and inconvenient junction for people and would create an incoherent spatial structure with poorly integrated open space and a confused internal movement network.

An alternative approach for re-organising the site was articulated through our previous urban design comments, to act as a platform for negotiating and revised and improved proposal for the site. After a period of around 5 months, a revised proposal was tabled, which was then discussed and amended further over a series of meetings and following another review by the Greater Cambridge Design Review Panel (GCDRP). The evolution of the revised proposal is summarised in the Environmental Statement (ES) Addendum and within The Design and Access Statement (DAS) Addendum which clearly explains the evolution of the revised proposal, the key changes and the rationale behind them.

The applicant presented an emerging proposal to the Cambridgeshire Design Review Panel on 23.04.24 which contributed to further changes. Whilst we note that a high-level overview of the changes to the scheme following DRP's review are set out on pages 32-33 of the DAS, we request that a more detailed response is provided, as we requested during discussions prior to the resubmission. We request that a more detailed summary table is submitted, that provides a more detailed response to all comments raised by panel in their most recent report, providing clarity on the action taken or a justification as to why the suggestion was not incorporated into the proposal. This is something that is routinely undertaken on strategic sites applications.

Action:

- 1. Submit a summary table that provides a clear response to all comments raised by the DRP on 23.05.24, providing clarity on the action taken or a justification as to why the suggestion was not incorporated into the revised proposal.**

Establishing a strategic control framework

The revised outline planning application (OPA) in summary, is for redevelopment of the Beehive Centre, to create a new high-quality centre of activity that supports knowledge intensive industries, structured around a new network of integrated streets and public open spaces with active mixed use ground floors. The ambition of breaks away from the traditional employment campus park model shifting towards a more mixed use, place based, and people focussed approach; an overall step change that is supported.

The OPA is organised through a series of key control documents, including a set of themed parameter plans and a design code, that seek to control the future redevelopment of the site. Together, they establish key principles and an overarching coordinating framework to guide future reserved matters applications (RMAs). The parameter plans will form the approved drawings for the outline planning permission and the design code will form an approved document in which compliance will be conditioned; ensuring both key control documents will have significant weight in the determination of future RMAs.

The OPA sets out the key structuring principles for the proposed development through the parameter plans which fixes key movement corridors, streets and open spaces, in relation to a series of development plots with height and land use parameters. The parameter plans enable site wide clarity and consistency to be established for key elements to avoid a piecemeal approach that would limit good integration, whilst still allowing some flexibility for the design to evolve at a later stage. From an urban design perspective, the revised parameter plans are considered to cover the appropriate themes and level of prescription for a site of this complexity that is likely to be developed over many years.

The submitted design code forms a key control document that supports the OPA, setting out rules and requirements to guide the design of subsequent applications towards high-quality design. It will be used to assess RMAs which will need to demonstrate compliance with the design code. The design code has undergone substantial revisions after an in-depth review by officers of a pre-submission draft which included a focussed page turning session with the applicant's design team to take them through officer's comprehensive comments and suggested changes. New additional site wide control topics and coding instructions have been added related to mitigating urban heat and active travel for example, with a significant reworking of other critical strategies relating to cycling, urban greening, massing, public realm etc,

as well as the more detailed coding instructions related to specific development plots. Significant editing has been undertaken of text, to ensure clarity on the interpretation of coding instructions and key principles, with a careful refinement of the mandatory 'musts' and strongly recommended 'should' language throughout. We have outlined a number of further refinements that are required to the design code in a dedicated section of our comments, and subject to those further refinements, urban design consider that the key principles and detailed strategies set out in the design code could form an effective and robust tool to steer the positive transformation of the site.

The outline application proposal is supported by an illustrative masterplan, which provides an indicative visual representation of how the proposal could work in practice and be delivered within the overall framework established by the OPA. It is helpful in showing how the key elements of open spaces, streets, and active travel could be integrated, and how a vibrant mixed-use environment could be achieved when fully built out. However, it is important to note that the illustrative masterplan shows one way in which the principles set out through the parameter plans and the design code might be applied and implemented, and accordingly it is therefore not a plan for approval.

The CGI's contained within both the DAS and the design code, help to bring to life the vision showing how the spaces might feel and function and the overall quality of design intent. Images show people orientated, comfortably proportioned, streets and spaces activated by meeting points and mixed uses at ground floor, that could support vibrancy throughout the day. There is an overall sense of a more human scaled streetscape, with buildings shown of varied scales, and elevations incorporating finer grained elements, portraying a sense of depth and richness to them. These images show a step change away from the generic business park model and are important in setting the tone and quality for the future RMAs. We therefore agree with the recommendation in the Environmental Statement (ES) that the DAS should be listed as a document for approval.

Action:

- 2. Design Code to be listed as a document for approval and a compliance condition attached to the outline approval to require accordance with design code and the submission of compliance checklist.**
- 3. DAS to be listed as a document for approval.**

The following sections provide a more detailed explanation as to how the revised application has addressed our previous issues raised in our original comments (dated

09.11.23), as well as identifying the further refinements that we consider are needed to the application. However, overall urban design are now more comfortable with the limits and site wide envelopes that are being established through the revised outline application parameter plans, and when considered alongside the substantially revised design code, the application is considered to create a much improved structure, creating a more robust overarching strategic framework that strikes a good balance between flexibility and control, and has the potential to guide the future RMAs in a coherent and more responsive way.

Structure: Movement Framework

We previously raised fundamental concerns regarding the basic spatial structure in which the original parameter plans were seeking to fix, which we considered created an overall layout that lacked coherence, would create a highway dominated junction, an uncomfortable and inconvenient gateway for people, a confused internal movement framework and an indirect main link for cyclists and a weak “spine” route through the site.

The spatial structure of the revised outline application has been reworked, and we now feel that the proposed parameter plans, and design code are working well together to establish a clear network and hierarchy of well-connected streets and open spaces that will improve connectivity for people, encourage walking and cycling, and create a layout that has the potential to positively integrate into the surrounding neighbourhoods. The overall movement framework is therefore supported.

The main entrance into the site, which had been largely ignored in the previous application by assuming the retention of a roundabout solution, has been re-imagined through the revised application as a CYCLOPs junction, which provides for a more comfortable and convenient experience for pedestrians and cyclists. Whilst we acknowledge this is an illustrative solution, we consider this a positive change and is welcomed.

The realignment of the primary route for cyclists and pedestrians to reflect the main desire line through the centre of the site is another positive key spatial design move proposed through the revised application, enhancing connectivity for active travel. This has created a stronger and more legible, active travel spine through the site and has helped to create a more convincing proposition for the location of mixed-use ground floor uses, that are now more concentrated along the “hot routes” and around key spaces that are likely to receive the highest footfall. The design code has been revised to include new coding themes focussed on active travel, compliance with LTN 1/20,

and design strategies to moderate cycle speed in key public realm areas where higher pedestrian footfall is anticipated.

The principle of embedding the cycle infrastructure into the main central spine as part of the most obvious route through the site, is in our view the most pragmatic approach, and in combination with the strategies set out in the design code, the outline application sets a framework for the greenway to be a moderated speed route, managing the conflicts between people and cyclists to a greater degree than if the cycle route were removed altogether.

The revision to the spatial structure has also led to a positive change of rationalised access for vehicles, which means they are no longer penetrating deep into the site or moving around the edges of key open spaces. These changes to the access and movement framework, has enabled a significantly enhanced public realm framework to now be established, that is more continuous and has created larger car free areas.

While we appreciate the design code establishes strategies to ensure that the streets that make up the “servicing loop” will integrate trees and landscape, we would like to see a commitment for a site wide design speed of 15mph or lower, to ensure the balance of the streets favours pedestrians and place. We are happy for this to be conditioned and for this to also be addressed through inclusion in the design code (see design code recommendations table)

Action:

- 4. Site wide 15mph design speed to be conditioned.**

Structure: Public Realm Framework

The second structural element that we objected to in the previous application, related to the poor arrangement and integration of public space, which was resulting in a dead-end destination space, a “back door” southern entrance and overall structural legibility issues.

The revisions to the proposed spatial structure have resulted in significant enhancements to the public realm framework. The parameter plans and design code together are now establishing a successful and strong public realm structure that will create a series of well-defined, legible and well-connected key open spaces. The proposed open spaces are larger and more diverse in character than the previous

application and now have the potential to create a more welcoming public realm that could integrate well with the surrounding communities.

The introduction of a new public park at the southern site entrance and located on the main desire line through the site, is a positive key spatial design move of the revised outline planning proposal. The new park is well located and of a good size that will work well as an integration tool to help manage the transition in scale and character and create a sense of continuity with the exiting fabric. The reconfiguration of the previous square, which provides flexible activity space for a range of events, helps to reinforce the new park as a key destination space and creates for a clearer sense of hierarchy overall to the public spaces. Revisions to the building plots along the central spine allows for good visual connectivity from the top of “Garden Walk” to the new park which will support good legibility in the overall spatial structure. The design code sets out a site wide urban greening framework that integrates green and blue infrastructure throughout, with suds, ecological and biodiversity enhancements, leisure and play, and opportunities for public art (as set out in the site wide public art strategy). Our previous concerns regarding the structure of the proposed public realm framework have therefore been addressed.

Scale and Massing

We previously objected to the proposed scale and massing of the originally submitted outline application, which we felt was creating unacceptable harm on the skyline of the City, local townscape and immediate neighbours of many of existing residential properties that back onto the site. We considered that the previous building height parameter plan would establish scale and massing envelopes that could not be mitigated through the employment of design code strategies.

The iterative evolution of the revised application in response to previous comments is set out in both the Environment Statement (ES) and DAS, with technical visual representations of the amended building heights parameter plan and illustrative schemes contained as part of the revised townscape and visual impact assessment (TVIA).

Longer distance views – The previous outline application was considered to result in an unacceptable harmful visual impact on the skyline from longer distance policy 60 viewpoints, which we considered to be most obvious in the verified views from Worts Causeway, Little Trees Hill, Red Meadow Hill and Castle Mound. We were particularly concerned that parameters for previous plots H,K, L, M, G and F was producing long, horizontal massing envelopes that were coalescing into one monolithic, bulky cluster

that noticeably protruded above the horizon and competed with the layered grain of the city fabric. The boxy and bulky volume of Plot C was also considered unacceptable due to it rising significantly above the prevailing townscape in an incongruous and imposing way.

Considering these policy 60 viewpoints against the revised proposal, we now feel that the meaningful and holistic reworking of the spatial structure (open spaces and building plots) and the revised massing strategy have led to a positively altered, and lowered skyline profile, in comparison to the original application. The tallest and most impactful building plots of the previous scheme (Plots C, F, G, L, M) have been reduced in height by 1 storey (with reductions ranging between 3.6m-5.5m) which has notably reduced the height and geographical extent of the taller cluster that either merges with the horizon or sits below it. The technical visualisations are demonstrating that the form and scale of the revised scheme now blends more favourably with the layered city fabric of mature trees and buildings, allowing the special features and landmarks of the Cambridge skyline to remain distinctive and legible.

The design code strategies governing massing has been substantially revised, and overall, we now consider that it will form an effective control measure in further reducing the visual presence of the maximum height envelopes, through controlling the detailed architectural responses of the future RMA's. This expectation is reinforced on page 68 of the design code which states that "the design codes will shape each building beyond the massing envelope defined by the parameter plans to articulate, sculpt, and refine each building to be highly responsive to its plot, character area, the site and wider setting". Each RMA that will come forward will continue to be scrutinised from the relevant key TVIA viewpoints (as mandated in the design code) which will be agreed at the outset of the more detailed proposals.

Proposed flue location zones set out on the parameter plans have been considered to lessen competition with the Cambridge skyline; with revised and tighter strategies to further control their final appearance and architectural quality set out in the design code. The upper limit of the parameter plan envelope excludes flues, which are limited to an exposed height of 25% of the highest point of the building – the percentage based on industry guidance. However, this limit is a forced worst case scenario, and it is expected that through detailed M&E modelling for RMA's flues will be lower. Through consideration of the illustrative technical visualisations that model a potential more detailed proposal (Appendix 10.6a), we are satisfied that the flues could become an integrated part of the Cambridge skyline.

The building heights and plot parameter plan key clarifies what is included in the maximum height envelope, however for avoidance of doubt we would like the key text to also refer to lift overruns, and therefore require the text to be amended to read “Top: AOD measured at parapet level and includes roof top plant, lift overrun and PV...”

In summary, we consider that the revised maximum building heights and plot parameter plan in relation to the longer distance Policy 60 views is now considered acceptable from an urban design perspective.

Action:

- 5. Amend building height and plot parameter key text to read “Top: AOD measured at parapet level and includes roof top plant, lift overrun and PV.....”**

Localised views – In the more localised views of Coldham’s Common (Viewpoint 3) and from the Corner of Sleaford Street (viewpoint 4), we were previously concerned that the proposed heights were creating boxy, monolithic and overly horizontal envelopes that dominated and loomed over the finer grained foreground context.

The restructuring of the spatial layout to create a new park to the south in combination to the revised massing envelopes, has significantly improved the visual relationship with the conservation area, creating a more gradual transition.

The reduction in the proposed parameter plan heights and the resculpting of envelopes to include tiered scale limits for some plots along the railway corridor has helped to mitigate the appearance of a continuous built form edge from the closest viewpoint location in Coldham’s Common (Viewpoint 4), creating a more varied and less imposing upper height envelope to the visible plots, and has overall, created a more convincing site wide massing strategy which rises towards the centre of the proposal site. The substantial revisions to the design code massing strategies have been specifically undertaken to control and break down the massing and perceived bulk of future RMAs, with mandatory “must” instructions relating to modulated massing, variation in height, form and silhouette, and façade articulation to create an attractive, and diverse townscape that integrates with the existing fabric.

Viewpoint 8 visualisations from Mill Road bridge, demonstrates how the revised parameter plans, creates a massing that can sit comfortably within the increased sense of scale character that has been established through many recent

developments along the railway corridor, with upper building height parameters striking a scale relationship with tallest residential form of the Timberworks site on the opposite side of the railway, and sitting lower than the Ironworks development in the foreground.

In summary, the holistic changes to the spatial structure and building height parameters have noticeably reduced the visual impact of the proposed outline application on the longer distance and more localised viewpoints, and we therefore consider the parameters acceptable when considered from these views. Understanding that the outline nature of the planning application forces a worst-case scenario, we consider that maximum height envelopes being set through the parameter plans are now at acceptable limits in which the visual presence of the amended scheme can be reduced through the strategies set out in the design code.

Edge interfaces – We previously raised concerns about the proposed height and proximity of the development which we felt was creating unacceptable interface relationships with some of the closest existing residential properties that surround the edge of the site.

We acknowledge parameter plan envelopes for the plots nearest to residential boundaries have been moved further away or height parameters reduced, and chapter 6 of the amended DAS clearly shows these changes through cross sections and illustrative back garden views, which are welcomed.

A report has been submitted that assesses the potential daylight and sunlight effects of the proposals on key neighbouring properties, which considers the effect of both the maximum parameter envelopes and an illustrative scheme. The report shows that for the maximum parameter envelope plots modelled, there are a number of properties with results that fail to comply with the BRE guideline levels for daylight (VSC & NSL) and sunlight (APSH). These are largely concentrated in the St Matthews Gardens area and the southern end of Silverwood Close. We acknowledge that this presents a worst-case effect, and that the design code enforces further variation in height, modulation of the massing, and greater articulation of plots beyond the outline envelopes. However, whilst the results of the illustrative scheme are showing an improvement of the effects, they are still showing windows and rooms of properties in those areas that will transgress the BRE guideline levels, which requires further investigation. To ensure that daylight and sunlight impacts remain key considerations for future reserved matters applications, we recommend that additional coding instructions are added to plots 1, 7, 8, 9, 10 stating “Reserved matters must

demonstrate that adequate daylight and sunlight of existing properties can be achieved”.

Action:

- 6. Add additional daylight and sunlight coding for plots 7, 8, 9, and 10 as set out in table 1.**

Mix

We previously commented that we were disappointed that the outline proposal could not integrate an element of residential development into the mix, highlighting the added place benefits it could bring. Whilst this disappointment remains, we accept that there is no local plan policy allocation in place for the site to materially require the inclusion of a residential component. However, we do acknowledge the ambition to create an active and engaging public realm, with a mixed-use ground floor that hosts a diversity of uses that will appeal to a wide range of people, with community spaces for local groups playing a part in this. The principle of a mixed-use ground floor is committed to through the submitted ‘Land use – Ground Floor’ parameter plan, which is positive. The supporting design code tightly prescribes mandatory design strategies relating to ground floor mix and activity and the delivery of high-quality green infrastructure, and therefore from an urban design perspective we are satisfied that the proposal could still contribute to creating a vibrant and engaging place throughout the day even without a component of residential. Furthermore, we consider that the parameter plans create an overarching strategic framework that is robust and flexible enough to accommodate future alternative uses on the site, without significant reworking of the spatial structure

Given the long-term transformation of the site, we are still of the view that a site wide meanwhile strategy should be developed that plans for temporary, short-term activities for vacant or underutilised public spaces and buildings. This could help to create new street life, build a positive identity and a more authentic sense of place from the start. As we mentioned before there could be positive synergies with artists’ studios occupying vacant buildings or loose fit new commercial units until demand exists. We are happy for this strategy to be secured via S106.

We are pleased to see that the parameter plans are now fixing on plot cycle parking for all the larger plots (plots 2-9). We have suggested some refinements to the design code requiring end of trip facilities and bike maintenance stations (see table 1 below).

Action:

7. Secure a site wide meanwhile strategy via S106.

Design Code

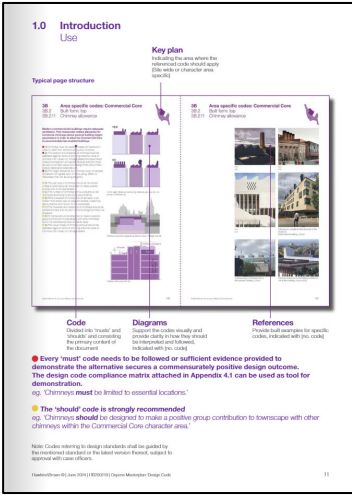
Whilst we are pleased to see that most of our pre-submission comments have been taken on board, there are however some detailed areas of the code that still require further refinement and errors that need to be corrected. Subject to the further amendments set out in table 1 below, urban design would be satisfied with the design code as a key control document to support the outline application. A compliance condition should be attached to require all reserved matters application to be in accordance with the approved design code and the submission of a design code compliance checklist that demonstrates how the application accords with the approved design code.

Table 1: Design Code requested amendments

Page	Requested Amendment - text changes shown in <i><u>underlined italics</u></i>
4	Introduction page needs further work. Our comments on the pre-submission draft requested clarity on status of the document, relationship with the parameter plans, drawings and precedents, which hasn't been addressed in the changes. We had previously pointed to the Oxpen design code to help shape this page and for it to be clear on how to use the code. Please amend this introduction page to reflect the following: Rename 'Description of document' heading under 0.0 Introduction to: <i><u>How to use the code</u></i> Delete paragraph 4 entirely – see further explanation in table row below. Add new section headings in below order and rework existing text. Suggested order and wording: • <i><u>Status and purpose</u></i> <i><u>This document is an approved planning document and will be used to assess Reserved Matters Applications that form forward for the redevelopment of the Beehive Centre.</u></i> Text can then go on to say...It is a vital document to ensure that the new development - Keep paragraph 2 under this section, but amend to read: <i><u>The design code sets out rules and requirements for the design of subsequent applications</u></i> to ensure each phase of the redeveloped

	Beehive will be done in a purposeful, coherent and coordinate way. - Add new paragraphs to this introductory section: <u>The code must be referred to for all design decisions. It is there to inspire good practice, sustainable design, and maintain project quality.</u> <u>The code must be applied at all stages of the development process, from concept design to planning and throughout construction.</u> • <u>The code requirements</u> - Suggested wording for section to read in this order: <u>The design code requirements take the form of two types of compliance:</u> [Add the must and should explanations as per original text on page 4] <u>All reserved matters applications will need to demonstrate compliance with this Design Code. Each application will need to provide a completed Compliance Checklist, and it is suggested that this is appended to Design and Access Statements.</u> <u>The Code sets a quality baseline, but teams are invited to be innovative and show how they can deliver or exceed the quality, sustainability and placemaking requirements of the code.</u> - Amend paragraph 3 and include under this section, to read: <u>Where recommendations are not followed, alternative proposals must be justified by their potential benefits, this could include the need to meet changing legislation or technological advancements. All deviations from the Code must demonstrate an improved design outcome, and show how they maintain the wider quality, sustainability and placemaking requirements of the code,</u> • <u>The introductory text</u>
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	<u>Each section of the code includes a short bold introductory statement, which summarises the strategic objective that must be delivered.</u> <u>Diagrams and precedent images</u> <u>The code contains diagrams help to visually explain the key principles of the site wide strategies and are mandatory unless otherwise stated.</u> <u>The precedents within the code should be taken as indicative of a particular concept, approach or idea which is explained within the supporting caption. Precedents should not be treated as fixed outcomes to copy.</u> <u>Parameter Plans</u> <u>This design code must be read in conjunction with the following parameter plans:</u> [list them] <u>Updating the design code</u> Amend wording of last paragraph on page 4 and include under this section. Amend wording to read: The Design Code will be in place to support the delivery of the whole project. <u>However, needs and objectives relating to social, climate, and technology frameworks may change, and as such the content of the code should be open to review with the Local Planning Authority over the lifetime of the project, with any proposed changes taken to the Design Review Panel and other stakeholders as part of a collaborative approach and open dialogue.</u> Add small vignettes to show a typical page structure that points to all the elements described above ie. The bolden introductory text, code requirements, strategy diagrams and precedents. (We previously pointed to the Oxpen Example)
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4	Delete the sentences in the 4 th Paragraph regarding the hierarchy to the structure and that a code item can be overridden by one in a lower tier. This is a confusing paragraph, and we don't agree as it could lead to the undermining of the site wide principles.
8	Delete "with all matters other than maximum massing being reserved". There is no need to pull this out separately; it creates confusion with the description of development.
12	Insert exemplary and design excellence into the vision. Adjust wording to read: The Beehive redevelopment will create an <u>exemplary</u>, high quality innovation neighbourhood, which <u>delivers design excellence</u>.
18	Add " <u>Maximising vertical greening by using climbing plants on facades</u> " under para 2.1.4 which lists strategies that can combine to mitigate urban heat.
22	Legibility Framework to stress the importance of design excellence. Add additional sentence onto end of bolded introductory paragraph: <u>All buildings regardless of hierarchy must exhibit design excellence.</u>
23	Amend diagram title to "Legibility Framework". Diagram is not just about markers and focal points.
26	Cycling Add additional coding requirements after paragraph 2.5.11, including <u>High quality end of trip facilities must be integrated within on plot cycle parking such as changing rooms, showers and lockers.</u> <u>Bike maintenance stations must be provided within on-plot cycle parking.</u>

	Add additional active travel example modes onto end of paragraph 2.5.16 to read: • <u>Provision should be made for the parking of other active travel modes such as scooters, and hire schemes for e-scooter and e-bike.</u>
27	Poor precedent images. Would prefer images that show exemplary cycle stores, end of trip facilities (coding para 2.5.6), and entrances to stores that are expressed positively through the architecture of the building. (coding para 2.5.14).
30	Add new coding instruction after paragraph 2.7.5 covering public WiFi access • <u>Public WiFi access should be provided across the site.</u>
31	Paragraph 2.8.7 that restricts private car access to accessible only is a <u>must</u>, not a should. Please amend. Additional coding instruction required for the loop road to ensure the streets are designed to have a high place function, so that vehicles are treated as guests. Add additional coding instruction required after paragraph 2.8.7 to read: • <u>The loop road must be designed as a street with a high place function, with a design speed of 15mph or lower and minimum carriageway widths, so that vehicles behave as guests.</u>
32	Would like to see 2 additional precedent images; one image that shows a high place functioning street that accommodates servicing, and the second that shows parking broken up by trees and integrated landscape - see Nightingale Estate, Hackney example below. 
48, 49 & 50	Wrongly labelled street sections. Please correct mistake.
54	Planting

	Add new coding instruction to create good ground conditions to allow climbing plants to survive. Suggested wording: • <u>Where vertical greening is proposed by way of supported climbing plants adequate soil capacity must be provided to ensure vigorous and sustained growth</u>
64	Not convinced by the separate Site Wide Wayfinding Strategy - whilst the high-level principles set out in the design code governing signage are sensible, we consider the submitted Site Wide Wayfinding Strategy that the code refers to requires further work before it could be considered acceptable. In our view there is simply too much signage assumed, which could lead to a cluttered public realm that is already under pressure to work very hard, and we're not convinced by the strategy for gigantic, oversized lettering on buildings. However, this issue can be resolved at a later stage, and we advise that a condition is therefore attached requiring further work and amendments to the Wayfinding Strategy.
74	Reinforce design excellence. Adjust wording of para 3.4.0 to read: • All building facades must be thoughtfully designed, <u>exhibiting design excellence</u> regardless of hierarchy...
84	Paragraphs 4.1.3 and 4.1.4 are a repeat of one another. Design Code to be amended to correct mistake.
86	Delete the word "by" in opening paragraph as pedestrian routes are not segregated by cycle routes. Amended to read: • ...This linear space will include legible and comfortable pedestrian routes, segregated by cycle routes with clearly legible pedestrian crossing points, social seating and a variety of tree planting...
99	Diagram 5.1.1 – wrong paragraph reference in accompanying key. Amend to read (Code <u>5.1.3</u>)
110	Plot 7 Neighbouring Conditions • Add coding instruction to ensure further consideration of Daylight and Sunlight impacts. Suggested wording: <u>"Reserved matters must demonstrate that adequate daylight and sunlight of existing properties can be achieved"</u>. •
112	Plot 8 Neighbouring Conditions • Add <u>"and mitigated"</u> to end of paragraph 5.8.4. • Add coding instruction to ensure further consideration of Daylight and Sunlight impacts: <u>"Reserved matters must demonstrate that</u>

	<u>adequate daylight and sunlight of existing properties can be achieved</u>
114	Plot 9 Neighbouring Conditions • Add <u>“and mitigated”</u> to end of paragraph 5.9.5. • Add coding instruction to ensure further consideration Daylight and Sunlight impacts. Suggested wording: <u>“Reserved matters must demonstrate that adequate daylight and sunlight of existing properties can be achieved”</u>
115	Diagram 5.9.3 - What does the dark green colour mean? Add to accompanying key. Light grey arrow does not appear on diagram.
116	Plot 10 The need for exemplary and innovative design solutions must come through stronger to ensure the expectation for excellence is clearly communicated. Adjust introductory paragraph wording to read: • Plot 10 is a prominent plot within the masterplan that requires <u>exemplary and innovative</u>, high quality design solutions. • Adjust Architectural Treatment paragraph to read: • The proposed building must feature architecture that is <u>exemplary</u> with <u>high quality</u> materiality...” Neighbouring Conditions • Add <u>“and mitigated”</u> to end of paragraph 5.10.5. • Add coding instruction to ensure further consideration of Daylight and Sunlight impacts. Suggested wording: <u>“Reserved matters must demonstrate that adequate daylight and sunlight of existing properties can be achieved”</u>
119-122	Example Compliance checklist We consider that a compliance checklist should not only be used to justify a deviation but should also be used to in a concise and cogent way to demonstrate accordance with the design code. Please adjust the introductory text page 119 to reflect this, and amend the checklist column to read Amend checklist comments column to read: • <u>To demonstrate accordance with the design code</u> or explain a reason for a change.

Actions:

- 8. Further amendments to design code required as set out in table 1.**
- 9. Add condition to require further work and amendments to ‘The Beehive Masterplan Outline Wayfinding Strategy’.**

Conclusion

In conclusion, urban design is now more comfortable with the limits and site wide envelopes that are being established through the revised outline planning application, which have noticeably reduced the visual impact of the proposal on longer distance and more localised viewpoints. The amendments have created a much-improved spatial structure with enhanced connectivity for active travel and significant enhancements to the public realm framework, which has the potential to be vibrant and engaging. When considered alongside the substantially revised design code, the OPA now creates for a more robust overall strategic control framework that has the potential to guide the future RMA’s towards high quality design in a coherent and more responsive way.

Subject to the suggested conditions, minor change to the building heights parameter plan key text and the further requested refinements to the design code, urban design would be in a position to support the application.