

BEEHIVE CENTRE APPLICANT REBUTTAL

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1.0 Introduction

- 1.1 In this rebuttal proof of evidence, we respond to Andrew Martin and Ian Dias' proofs of evidence (CD7.02) and (CD7.01) which have been submitted on behalf of the Local Planning Authority (LPA). This rebuttal is prepared by Guy Kaddish in respect of planning matters, with input from Alastair Macquire, Steven Handforth, and Jonathan Lonergan in respect of townscape and visual, heritage, and daylight and sunlight matters respectively.
- 1.2 References to paragraph numbers are to those used in Andrew Martin or Ian Dias' proof (as relevant) unless otherwise stated.

2.0 Rebuttal Comments

Planning

- 2.1 This section has been prepared by Mr Kaddish.

Parameter Plans and Illustrative Scheme

- 2.2 Mr Martin's evidence at paragraphs 4.46 and 4.113 states that the parameter plans represent the 'worst-case' scenario and that a reserved matters application could propose a detailed design extending to the maximum limits defined by parameters.
- 2.3 This is incorrect. In no circumstance is it possible to build out to the full extent of the parameter plan envelope. It presents an overall mass which is greater than that which can be delivered by a Parameter Plan compliant scheme, even before the Design Code is applied.
- 2.4 The controls within the Parameter Plans prevent the full massing envelope from being achieved. These controls include defined minimum separation between buildings, percentage plot coverage controls, and requirements for separation between building elements. In addition, there is a proposed planning condition that will limit the development to a total of 166,685 sq.m Gross External Area. Finally, the Design Code includes many codes that will act to reduce the scheme to be smaller than the maximum parameter plan envelope. Mr Leonard's evidence at section 7.4 provides an overview of the Design Code controls. For example the Design Code (CD2.12) includes section 3.1 'massing' and most plot specific sections also have their own 'Height & Massing' codes.
- 2.5 The scheme will therefore be smaller overall than the Parameter Plan massing envelope.
- 2.6 The Illustrative Scheme is tantamount to the overall deliverable maximum scheme, in accordance with the Parameter Plans and Design Code. There is the possibility for deviation from the Illustrative Scheme but this is limited while striving to optimise the efficient use of the land. Mr Leonard's evidence (CD7.12) confirms this point at paragraph 9.0.1. As such, the Illustrative Scheme does attract weight to inform the determination of the application.
- 2.7 While my evidence finds the Parameter Plan scheme is acceptable in daylight and sunlight terms, in circumstances where the scheme at reserved matters stage will be smaller than the Parameter Plan massing envelope, Mr Martin's position at his paragraph 4.129 is relevant in that he states "A development of lesser scale and massing [to the parameter plan maximum envelope] could achieve more acceptable daylight and sunlight results, as evidenced by the Illustrative Scheme, which performs better against the BRE guidelines". The degree to which such a scheme would be "more acceptable" does not appear to have been assessed by Mr Dias and Mr Martin. Mr Lonergan's evidence provides a detailed assessment.

Benefits and Harms

- 2.8 I provide at appendix 1 a summary table to compare my judgements on planning benefits and harms to those of Mr Martin. There is a broad alignment. The substantive difference is I attach

greater benefit to the creation of a much improved and well-designed new place and with regards to harm, I attach less harm to residential amenity.

- 2.9 Mr Martin identifies three harms (slight, significant and substantial in weighting respectively) and ten planning benefits (one slight, three moderate, four significant and one substantial in weighting). While the planning balance is not a mathematical exercise, it is a little difficult to see on his evidence taken at face value how the harms outweigh the benefits.

Daylight and Sunlight – Correction

- 2.10 In my evidence I should have noted additional properties in St Matthew's Gardens to receive slight harm at paragraph 6.37, 6.47, 6.92 and 6.95. These paragraphs should also include 177-185 (odd), 189, 191, 195, 197 and 201 St Matthew's Gardens to receive slight harm, being those properties in the central apartment block facing Plot 8.
- 2.11 My summary of Mr Lonergan's evidence on this point at paragraph 6.36 (v) of my evidence reads:
- 177 – 201 - Changes may be perceptible although boundary condition will limit this. Retained VSCs of 18% - 25% are adequate such that use of spaces is not affected. Use unlikely to be affected based on retained amenity.
- 2.12 But should instead read (correction highlighted):
- 177 -201 - Changes may be noticeable although boundary condition will limit this. Retained VSCs of 18% - 25% are adequate such that use of spaces not affected. Use unlikely to be affected based on retained amenity.
- 2.13 This correction does not impact on my overall findings on harms or my planning balance.

Heritage Legislation

- 2.14 At paragraph 4.215 of Mr Martin's evidence he states (my emphasis) "*I have had regard to the statutory duties established under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and to the duty of regard established under section 102 of Levelling-up and Regeneration Act 2023*".
- 2.15 In the Statement of Common Ground (CD6.03), the correct position is agreed that only section 66 applies, stating "*It is agreed that Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is not relevant to this application as the Site is outside the boundary of any conservation areas*".

Daylight and Sunlight

- 2.16 The following clarifications and points in rebuttal have been prepared by Jonathan Lonergan in relation to the daylight /sunlight evidence submitted on behalf of the LPA. It references both the proof of evidence of Mr Ian Dias (CD7.01) as well as relevant sections from the evidence of Mr Andrew Martin (CD7.02).

Application of 2-Stage Test

- 2.17 Mr Dias notes (paragraph 5.4) that he focuses on the first stage of the 'Rainbird' - test considering the extent of reduction and whether the effect is noticeable. Mr Dias' classification of 'harm' is therefore limited to the extent of 'change' with no consideration of the adequacy of retained amenity levels under Local Plan policy 60. This is a fundamental difference to the scope of my evidence which addresses stage-2 of the Rainbird test and includes a number of wider considerations informing the question of acceptability and adequacy of retained daylight levels as set out at paragraph 8.1.10 onwards of my evidence.

Accuracy of Daylight / Sunlight Assessment

- 2.18 Mr Dias' comments (at paragraph 3.11 of his proof) regarding the extent of his technical 'spot checks' are noted. It should however be stressed that there is no suggestion by Mr Dias of any concern with the accuracy of the agreed technical results (paragraph 3.13 of Mr Dias' evidence). The technical results relied upon in Mr Dias' work are the same as those relied upon by me, with no dispute as to the extent of changes resulting from the proposals and little differential in the application of 'significance'. The relevant analysis is attached in full at appendices 1-5 to my proof of evidence (CD7.09)

Relevance of Illustrative Scheme

- 2.19 Mr Dias focuses almost entirely on the parameter plan scheme. He describes the Illustrative Scheme as 'one possible massing option' (paragraph 3.13) and gives little consideration to the detailed effects of the illustrative proposals. I consider this to be a potentially significant omission. Whilst I conclude that the effects of the maximum parameter scheme are acceptable it is also highly relevant to consider the effects of the Illustrative scheme.
- 2.20 The controls within the application limit the area that may be delivered across the site as well as the specific massing extents for each individual plot. The Illustrative Scheme therefore represents the likely maximum scale of the proposals that may be delivered under subsequent Reserved Matters applications. This limit on effects is further secured by the requirement within the design code that the daylight / sunlight changes resulting from plots 6-10 are reconsidered at Reserved Matters stage (see paragraph 4.1.11 of my evidence). It is therefore clearly of use to review the Illustrative scheme as the likely 'actual' effects to neighbours when the proposals are delivered.
- 2.21 This failure to engage with the relevance of the illustrative scheme is further evident in section 11 of Mr Dias' evidence as well as paragraph 4.46 of Mr Martin's evidence. Despite limited commentary Mr Dias does however confirm (at paragraph 11.1 of his proof) that the illustrative scheme would have a 'significantly lesser effect' on daylight and sunlight to the neighbouring properties' and this is reflected in paragraph 4.129 of Mr Martin's evidence.

Whether Effects are Minimised

- 2.22 Related to the above Mr Dias and Mr Martin cite the presence of the Illustrative Scheme as evidence that the application does not seek to 'minimise' the effects upon neighbouring amenity (paragraph 11.6 of Mr Dias' evidence / paragraph 4.129 of Mr Martin's). This is an incorrect characterisation of the significance of parameter plans and illustrative schemes within an outline application.
- 2.23 The parameter plans provide elements of the framework within which more detailed design proposals may be generated. The controls within the application set clear constraints on the area and mass that may be delivered within the parameters. The illustrative scheme is an embodiment of these controls and the likely maximum extent of such future applications.
- 2.24 The fact that the illustrative scheme is of more reduced scale and greater articulation confirms the application to be successful in controlling the deliverable mass within the parameters. Contrary to the LPA's evidence this therefore supports the fact that the application seeks to minimise amenity impacts.

Application of 'Weighted VSC' results

- 2.25 Paragraph 3.13b of Mr Dias' evidence notes the effect of the application of 'room weighted VSC' leading to further spaces meeting the BRE guidance. This is also noted at paragraph 4.31 of Mr Martin's evidence where he suggests the weighted VSC presents a 'reduced impact'.
- 2.26 Weighted VSC has been correctly applied in line with the BRE guidance and does not 'reduce impact'. The changes to windows remain but the VSC weighting considers the holistic extent of change across a room.

Change of Position on Stage 1 of Rainbird Test

- 2.27 Mr Dias' evidence contains an inconsistency. He explains that he is only carrying out Stage 1 of the 'Rainbird' test which has previously been agreed as a consideration of the numerical deviations under the BRE guidance. This is set out in paragraph 2.8 of Mr Dias expert review (CD11.02) where he states:

"2.8 The process of overall review follows a 2 stage approach;

Stage 1) - To establish those reductions which depart / do not meet the BRE Guide default target criteria and;

Stage 2 – To then consider the acceptability of such departures"

- 2.28 This is confirmed as the agreed position of the experts at paragraphs 3.1.10 and 3.1.11 of the Supplementary Daylight and Sunlight Statement of Common Ground (CD6.06) which states stage 1 of the Rainbird test relates to the numerical BRE targets whereas Appendix H, and a number of other relevant factors, are considerations at stage 2.

- 2.29 In his evidence however Mr Dias approaches 'Stage 1' as a composite assessment of 'harm' based on numerical criteria (paragraph 6.9) as well as wider judgement based on EIA criteria set out at Appendix H of the BRE guidance (paragraph 6.11) and wider contextual consideration (paragraph 7.0 onwards). This is a shift from his previous position that limited Stage 1 to consideration purely of numerical reductions outside of the BRE targets.

Relevant Considerations under 'Stage 2' of the Rainbird Test

- 2.30 At paragraph 5.2 of his evidence Mr Dias presents only a short list of 4 relevant factors in respect of the second stage of the 'Rainbird' test with some focus on the 'site designation' and a loose concept of the 'potential for future change' in the area.
- 2.31 Whilst this is recognised as non-exhaustive list it may be contrasted with paragraph 3.1.11 of the Daylight and Sunlight Statement of Common Ground agreed between the experts as relevant considerations under the second stage of the test. This does not mention 'site designation' but does reference wider contextual factors and the appendix F and H guidance.

Inappropriate 'Contextual' Targets

- 2.32 Mr Dias' has checked his assignment of harm (i.e. significance of reduction) against two 'Contextual' studies at paragraph 7.0 onwards of his evidence. His focus is on the existing low-density predominantly 2-3 storey housing which is not considered to provide an informative comparator to an application which is for comprehensive redevelopment and the optimisation of the site. This is supported by the LPA's own appraisal of the opportunities afforded by the scheme as set out at paragraphs 4.13 – 4.18 of Mr Martin's evidence.
- 2.33 His conclusion, at paragraph 7.22, is that ground floor windows should achieve 'not less than' 27% with the exception of a single instance, at 177-201 St Matthew's Gardens, where 20% is appropriate for ground floor windows.
- 2.34 Mr Dias offers no explanation as to why a retained value of 20% is adequate for one property to St Matthew's Gardens but would not be adequate for immediately neighbouring properties.
- 2.35 A retained value of 27% VSC is the same as the default absolute VSC target set out in the BRE guidelines (CD8.01 para 2.2.23). This is a high hurdle derived from predominantly low-density two-storey suburban development that it is wholly inappropriate to apply when seeking to optimise land-use in the context of the application site. This is particularly relevant given the findings of Mr Martin at paragraphs 4.13 – 4.18 of his evidence that, amongst other material benefits:

'The proposed development represents a valuable opportunity to intensity use on a sustainability located brownfield site'

- 2.36 The application of the 27% figure is at odds with Mr Dias' earlier statement at paragraph 1.4 of his peer review that:

'For meaningful re-development, there is the potential that some reductions in daylight and sunlight may not meet the BRE Guide default target criteria'

- 2.37 The 27% default VSC target is also not reflective of the position agreed between experts set out at paragraph 3.1.7 of the Supplementary Statement of Common Ground that:

'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 that meaningful redevelopment may lead to the potential for some reductions in daylight and sunlight which may not meet the BRE target criteria.'

Mr Martin's Application of Contextual Targets

- 2.38 Based on Mr Dias' evidence Mr Martin also widely adopts the 27% default target for the majority of properties and states categorically that 'VSC values falling below these levels would be 'wholly inappropriate' (paragraph 4.142). I do not find this position to be sustainable given the statement at paragraph 24.7 of the committee report (CD3.01) that deviations from some degree of harm may be 'inevitable'.
- 2.39 An inconsistency is noted at paragraph 4.142 of Mr Martin's evidence which states Mr Dias has adopted a contextual target of 'no less than 27% for Silverwood Close and 25% for St Matthew's Gardens'. Mr Dias does not apply a lower 25% target for St Matthew's Gardens but utilises 27% across the board (with the exception of the 20% figure noted in respect of ground floor windows to 177-201 St Matthew's Gardens).

Failings in Mr Dias' Contextual Study

- 2.40 Mr Dias 'Typology' study takes a very limited sample of 7 potential ground floor window locations and 4 lower ground floor positions (paragraph 7.10). The positions of these samples are shown at Appendix B of his evidence (and are taken at positions that are favourable to findings of high VSC levels).
- 2.41 This includes samples positioned between long separating gardens (TP1 – 3 and TP2-LG / TP3-LG), facing a large courtyard (TP4 and TP4-LG), and facing a neighbouring roadway (TP6). These sample points do not reflect the varied site context which has developed over time with a mix of historic Victorian terraces, post-war housing and more recent development since 2000. The limited sample omits consideration of elements such as windows positioned alongside rear extensions which are a significant feature of many extended properties to York Street and Silverwood Close.
- 2.42 The inappropriate nature of the sample is illustrated by Mr Dias' findings at paragraph 7.12 that a contextual value in respect of lower ground floor windows to St Matthew's Gardens would be a 'low 20's VSC (say a VSC of 22%). It is not credible to set such a target given that pre-existing VSC levels to the lower ground floors of 171 and 175 St Matthew's Gardens are already below this figure even though they currently face an open area of the site. The pre-existing weighted VSC for these rooms is 19.4% and 16.8% respectively with existing individual window figures down to 12.8% at 171 and 10.1% at 175 St Matthews Gardens.
- 2.43 Whilst Mr Dias notes he has used the eb7 model for this study the sample points are all taken from areas of less detailed block context model. These areas do not benefit from measured survey elevation detail which would identify window positions, the articulation of neighbouring context, windows, facades which are required for accurate VSC assessment.

- 2.44 As a result of the deficiencies noted above very limited reliance can be placed on Mr Dias' typology assessment.

Results of 'Mirrored Baseline' Study:

- 2.45 In addition to the 'typology study' Mr Dias presents a 'mirror development' as a further comparator of potential 'contextual' VSC values. This study considers the effects that would occur to St Matthew's Gardens and Silverwood Close if the separation and massing of the existing properties were 'reflected' on the Beehive site with all other proposed massing removed (paragraph 7.17). Again I do not consider the existing low-density housing to be an appropriate comparator in respect of an application for comprehensive redevelopment and the optimisation of the site.
- 2.46 Notwithstanding the above I note that Dias has presented results only for the ground floor windows of the St Matthew's Gardens properties in his mirror study. The mirror massing approach would also be applied to windows at other levels however these results have not been presented.
- 2.47 Following Mr Dias' presentation of the 'mirror' study I have undertaken the same exercise considering the retained lower-ground floor levels to the most sensitive properties at 177-201 St Matthew's Gardens and 175 St Matthew's Gardens. These results are shown below alongside a comparison of the retained value under the maximum parameter and illustrative scheme:

Address	Room	Window	Room use	Vertical Sky Component (VSC)			
				Existing VSC	Mirror VSC	Parameter VSC	Illustrative VSC
177-201 Odd St Matthew's Gardens							
Lower Ground	R1	W1	Living Room	12.3	10.3	11.6	11.6
		W2		12.9	9.8	11.3	11.3
Lower Ground	R3	W5	Living Room	13.2	10.4	11.1	11.1
		W6		11.8	10.3	11.5	11.5
175 St Matthew's Gardens							
Lower Ground	R1	Weighted VSC	Kitchen	16.8	14.2	12.5	14.7

- 2.48 Mr Dias has stated the 'mirror' study illustrates a 'fair and equitable' share of daylight (paragraph 7.14). Whilst he omitted the lower ground floor, consideration of these figures shows the effects of application proposals to be in line with the 'mirror study' levels which Mr Dias considers appropriate.
- 2.49 At 177-201 St Matthew's Gardens retained levels to the living space of flats 177 and 179 under the parameter and illustrative scheme exceed the 'mirror' figure.
- 2.50 At 175 St Matthew's Gardens the retained value under the 'mirror' would be 14.2%. This is exceeded under the illustrative scheme. Whilst the parameter scheme falls below the 'mirror'

level the retained VSC would be within 1.7% of the mirror figure. This deviation would likely be unnoticeable to the residents.

- 2.51 I do not consider comparison with the existing housing to be an appropriate benchmark for the acceptability of a scheme for comprehensive redevelopment. It is however notable that the effects to the most sensitive lower ground floor windows as a result of the application scheme are in line with or better than the 'mirror' study results presented as 'contextual' by Mr Dias.

Clarification on results relating to specific units

- 2.52 Following review it has been noted that the numbering applied to a small number of neighbouring flats is slightly different between Mr Dias' evidence and my evidence. This relates to specific flats of 177-201 St Matthew's Gardens and 159 / 161 St Matthew's Gardens. Tables 3 and 8 of my evidence has been revised to ensure the same flat numbering as Mr Dias. This change does not affect any of the technical results, significance criteria, compliance summaries or conclusions in either Mr Dias' or my evidence. These updates are attached at Appendix 3.

Heritage

- 2.53 This section of rebuttal relates to heritage and has been prepared by Steven Handforth in response to Place Services' Heritage Peer Review and the elements of Mr Martin's Proof of Evidence which address heritage matters.
- 2.54 As both parties agree that any harm to the significance of the heritage assets will be outweighed by planning benefits, I am only responding to the key points raised by Place Services that Mr Martin's Proof references.
- 2.55 Place Services have identified additional heritage assets that they believe will be affected by the proposals. I consider these heritage assets below and the outcome does not affect the conclusions reached within my Proof.

Adequacy of Assessment

- 2.56** At paragraph 4.191 of Mr Martin's proof, he states (author's emphasis):
"The parties are agreed, as set out at paragraph 7.27 of the main SoCG, that the Heritage Impact Assessment (CD2.40a-d) submitted by the Applicant has been undertaken using an appropriate methodology, underpinned by a suitable evidence base and relevant guidance. However, as noted at paragraphs 7.38 and 7.39 of the SoCG, there remains disagreement between the parties in relation to the degree of impact the proposed development would have on the significance of the affected heritage assets."
- 2.57 He reinforces this view at paragraph 4.210 where he states:
"Notwithstanding the differing assessments of significance and level of impact between Mrs Woodley and the Applicant in relation to certain heritage assets – and the methodology critiques raised by Mrs Woodley in her review – I consider that overall the Applicant has undertaken an appropriate assessment of the heritage assets."

- 2.58 Furthermore, in paragraph 4.17 in the SoCG the parties agree that the ES approach was acceptable:

"It is agreed that the ES satisfies the requirements of the EIA Regulations and has been duly undertaken and reported..."

- 2.59 I am in agreement with Mr Martin's comments and it is therefore not considered necessary to go into further detail on these points

Additional Heritage Assets

- 2.60 At 4.196 Mr Martin states (in relation to Places Services' document, author's emphasis):

"In addition, she identifies minor to negligible harm to three further heritage assets beyond those noted in the consultation response of the Council's Principal Conservation Officer dated 7 November 2024 (CD9.36). These assets are: the Church of Our Lady and the English Martyrs, the West Cambridge Conservation Area, and the Old Cheddars Lane Pumping Station. Notably, Mrs Woodley's conclusion in relation to these assets aligns with the findings set out in Chapter 7 of the ES Addendum, although they are not referenced in the HIA itself, owing to an apparent inconsistency between the two documents."

- 2.61 It should also be noted that Places Services consider the grade II listed Custodians House to be affected within the Topic Paper.

- 2.62 All these heritage assets are assessed in the Heritage Assessment (HA) in section 10 (CD2.40b), where all impacts on significance are recorded as being neutral.

- 2.63 The HA states of the Old Cheddars Lane Pumping Station (Scheduled Monument) that:

"The pumping station was construction [sic] in 1894. Prior to this time, sewage was disposed of directly into the River Cam and caused severe health issues in Cambridge. The pumping station, along with new sewer system, was constructed by the County Council as a direct response to this hazard posed by exposed sewage."

The building is constructed in a combination of brick and wood. The areas which are constructed in wood were designed to ensure the fires for the station (which ran for 24 hours a day, 7 days a week) could not be seen at night to deter bombers during WWII raids."

The pumping station was in use until 1968 when it closed down. The building has subsequently been converted into use as a Technology Museum. Overall, the pumping station is considered to hold a good level of significance."

- 2.64 Of its setting it goes on to state:

"The setting of the building is formed is a combination of residential and commercial development as well as the River Cam itself. Due to the height of the chimney, there is a wider appreciation of the site from the wider city. As such, the setting of the pumping station is considered to make a moderate/good beneficial contribution to the significance of the structure."

- 2.65 Of the contribution of the site to setting:

"There is a limited awareness of the site from the pumping station due to the intervening built form and current lower scale nature of the buildings on site. As such, the site is considered to make a neutral contribution."

2.66 In chapter 10 of the HA, the impact of the proposals on the significance of the heritage asset is considered to be neutral. I agree with this conclusion.

2.67 In relation to the West Cambridge Conservation Area, the HA considers this with other conservation areas and states:

"The site is perceived as part of the urban backdrop of the conservation areas from wider viewpoints of the city. In its current form, the site is considered to make a neutral contribution to the setting of the Conservation Areas."

Whilst the proposed scheme would be more visible in certain viewpoints, it would continue to appear as part of the established and varied urban backdrop and would not stand out within the roofscape of Cambridge. Therefore, whilst there may be a degree of change from current conditions, it is considered that the proposals would have a neutral effect upon the setting of the conservation areas."

2.68 In chapter 10 of the HA, the impact of the proposals on the significance of this heritage asset is considered to be neutral. I agree with this conclusion.

2.69 In relation to the Church of Our Lady and English Martyrs (Grade I), again, the HA assesses this with other heritage assets and states:

"These assets are situated within the wider extended setting of the site. They have been grouped together for assessment as they are each visible in the panoramic, long-range view of the Cambridge roofscape from a number of the wider viewpoints of the city - in particular from Red Meadow Hill and Worts Causeway."

*In these views, the roofline of the proposed scheme would be visible. Although visible in the general views, the site is not seen in the immediate backdrop of any of the assets which separate it from the historic core. As a result, this ensures that they remain prominent features in the skyline, as now. The site would read as a component of the wider urban context for these assets, resulting in only a minor visual change from how it currently appears. Therefore, the proposed scheme would have a **neutral** effect on the setting of the asset group."*

2.70 In chapter 10 of the HA, the impact of the proposals on the significance of the heritage asset is considered to be neutral. The building is approximately 1.22 km away from the site and 1.6km away from the Castle Mound viewpoint. The proposed development would not harm the building through changes to its setting and I therefore agree with the conclusion of the HA.

2.71 In relation to the Custodians House (Grade II) the HA states:

"The Custodian's House is located to the south-west to the Mill Road Cemetery. It was added to the Statutory List for Buildings of Special Architectural or Historic Interest on 2n [sic] November 1972."

The building dates to 1848 and was originally constructed as a mortuary Chapel, although it has since been converted into a dwelling. It is single storey with accommodation in the attic and

formed in knapped flint with limestone quoins and dressing. The roof is gabled, with a clustered chimney stack, and has modern tiles.

As a result of the building's age, historic function and connection with the cemetery (although it has undergone alterations over time to convert into a house), the building is considered to hold a good level of significance overall."

2.72 Of the setting the report states:

"The setting of the building is formed is a combination of its small residential curtilage and its connection with the cemetery and wider streetscape. The connection to the cemetery is a fundamental contributor to its special interest and, as such, this setting is considered to make a high beneficial contribution to the significance of the building."

2.73 Of the contribution of the site to setting:

"There is no awareness of the site from the asset in its current form due to the intervening built form, small scale nature of the asset itself and the lower scale nature of the buildings on site. As such, the site is considered to make a neutral contribution."

2.74 In chapter 10 of the HA, the impact of the proposals on the significance of the heritage asset is considered to be neutral. I agree with this conclusion.

Environmental Assessment

2.75 In paragraphs 3.23-3.31 of Place Services' document, they acknowledge the potential limitations of the ES process, that by simply combining value and magnitude of effect through a matrix may not necessarily provide the appropriate category of impact on the heritage asset in NPPF terms. In particular, effects may have an effect on the appreciation and/or setting of the heritage asset but not necessarily have an equal impact on the significance of the asset. The ES has undertaken this process and has resulted in negative effects on the setting of some of these assets.

2.76 As acknowledged by Historic England in Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) The Setting of Heritage Assets 'Setting is not itself a heritage asset, nor a heritage designation.' When assessing impacts within the HA it is with a full understanding that the importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Cumulative Assessment

2.77 At paragraph 4.194 Mr Martin references that Place Services state that no cumulative assessment has been made. This is incorrect and can be found in Chapter 14 of the ES, paragraphs 14.21-14.24 (CD2.36G).

Impact on Skyline

2.78 Mr Martin at paragraph 4.206 states that:

"Mrs Woodley has identified that the proposed development would break the skyline and seeks to compete for prominence with a number of heritage assets, as set out in Section 4 of her Heritage Peer Review. She further observes that residual harm would remain even with the Applicant's proposed mitigation, given the scale and massing of the development and the flexible approach to flue design within the Design Code."

2.79 I consider that the proposals are not 'seeking to compete for prominence' at all, as is reflected in the many years negotiations that have taken place between the Applicant and the Council. The design has been refined over this period exactly to help minimise impacts rather than 'seeking prominence'. Whilst it is acknowledged that parts of the development would add to the skyline, criterion b of Policy 60 which states that proposals *must ensure that the character or appearance of Cambridge, as a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints* would still be adhered to. This is reinforced by the Design Code (CD2.12c) including paragraphs 3.2.4, 3.7.7 and 3.7.8. Design Code 3.7.1 states that 'Flues must....not compete with the historic landmarks'.

Approach to Grouping Assets

2.80 At paragraph 5.65 Mr Martin refers to the overall cumulative impact to heritage assets as being less than substantial at a moderate level. My view on this can be seen in paragraph 7.39 of the SoCG which states:

"The LPA notes in summary that there is a cumulative harm to heritage assets, which is stated to be less than substantial at a moderate level. The Applicant's view is that it is not considered best practice to approach the heritage assessment of these assets in this way (i.e. a cumulative total impact), because they are not a group and read in many different settings."

Townscape and Visual

Introduction

2.81 This rebuttal has been prepared by Alastair Macquire in response to the Townscape Peer Review, prepared by Place Services, which forms Appendix 1 of Mr Martin's Proof of Evidence on behalf of the Council.

Rebuttal Comments

2.82 At paragraph 1.32, Place Services state that **"whilst the Design Code is noted to provide outline strategies to shape building plots beyond the maximum massing envelopes, we consider a worst-case scenario requires the parameters to be assessed without the Design Code mitigation being factored in at this outline stage."**

2.83 At paragraph 3.2, Place Services go on to state that their assessment is based on the maximum massing envelopes of the outline parameters plans to reflect the worst case scenario and that the Design Code mitigation cannot be relied upon at this stage, a point reiterated within their conclusions at paragraph 4.2.

- 2.84 I disagree with this statement, and it is noted that, at paragraph 1.28, Place Services state ***“The Design Code establishes a series of development rules and requirements for the design of subsequent applications and must be referred to and applied at all stages of the development process.”***
- 2.85 As set out in my evidence, I consider that the Design Code must be taken into account when assessing the proposals, for the following reasons:
- It would form an approved document, should the application be permitted, and is therefore a material consideration.
 - The Code sets out the rules and requirements for the design of the Reserved Matters scheme to ensure a co-ordinated approach as well as ensuring that the principles established within the Outline application are taken through to the detailed design stage.
- 2.86 In addition, the Design Code has been developed through a detailed and co-ordinated design process, informed by the technical team as well as discussions with the Council. The response from the Council’s Landscape Team (dated 31st October 2024, CD 9.25b), who dealt with townscape and visual matters, states that the amended Design Code “successfully resolves any remaining landscape concerns”. The Design Code has been developed in response to significant adverse effects identified during the original scheme design and scheme evolution.
- 2.87 At paragraph 3.3, Place Services include reference to paragraph 2(3) of the Landscape Institute Technical Guidance Note – *Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition* (LI-TGN-2024-01). The guidance in GLVIA3 and the TGN do not specifically refer to Design Codes and I note that the TGN reference at paragraph 3.3 of the Place Services evidence states that:
- “It is important to rely for assessment on clearly defined parameters of the outline application for which permission is being sought, (for example the maximum height of development) although it is recognised that an illustrative masterplan or design illustrations, where these accord with the parameters, can help to provide further detail regarding the potential form of the development.”*** (my emphasis)
- 2.88 The Design Code goes beyond illustrative material, setting out a series of controls, and sets the bar in terms of the design of the development. The document sets out the rules and requirements for the design of subsequent applications and must be applied at all stages of the development process. A point noted by Place Services at their paragraph 1.28. I consider the Design Code to represent the actual worst case scenario in TVIA terms. As stated within the introduction to the Design Code (page 4, CD 2.64a), any deviation from the Code must demonstrate ***“an improved design outcome”***.
- 2.89 The Codes set out within **Townscape Rebuttal Appendix 2** are of relevance from the townscape and visual perspective and informed my assessment of the proposals, providing the ***“further detail regarding the potential form of the development”*** to ensure that the assessment in my evidence takes account of the worst case scenario in TVIA terms.
- 2.90 The Codes cited within **Townscape Rebuttal Appendix 2** are predominantly “musts”, meaning that any development within the Site must adhere to these requirements, however, I have also included some “shoulds” which also inform the massing, scale and appearance of the

development of the Site. While these provide some flexibility in the final design, as noted above, any deviation from the Design Code must result in an improved design outcome.

- 2.91 The approach adopted by Place Services in their Peer Review in relation to the Design Code means that their assessment overplays the adverse effects arising from the proposed development. There is no justification to support the comments in relation to Viewpoint 1 that the Design Code cannot be relied upon (table on page 18). As identified above, the Council's Landscape Team confirmed that the Design Code resolves any outstanding landscape concerns.

Conclusions

- 2.92 As set out above, I disagree with the statements and approach taken within the Place Services Townscape Peer Review with regard to the reliance on the Design Code.
- 2.93 The Design Code would be an approved document and is a material consideration. The Design Code goes further than the parameters plans in terms of setting out how the proposed development must be designed and, as such, represents an appropriate level of detail on which to assess the effect of the proposals upon the receiving environment, reflecting a true worst case scenario in TVIA terms.

APPENDIX 1

BENEFITS AND HARMS COMPARISION TABLE

A Comparison of Planning Weights - 27 May 2025 Evidence (Andrew Martin and Guy Kaddish) - Benefits and Harms

The topic list of benefits described by each party do not fully align, but there is a strong and broad alignment to allow a comparison

Where a topic has a x/y detail description, it represents a topic where the parties are similar in their description but there is a slight difference to register. (LPA/Applicant)

Planning Benefits			
TOPIC	DETAIL	LPA (Andrew Martin)	Applicant (Guy Kaddish)
Economic	Employment (jobs) (inc Employment and Skills)	Significant	
	Boost to the Economy/ Economic Impacts (inc jobs)	Significant	Great
	Employment and Skills Strategy		Moderate
	Cluster Effect	Great	Substantial
	Identified Need for Office and Laboratory		Great
Social	Sense of Place/Creating a Better Place (inc inclusivity)	Moderate	Great
	Community and Education / Community Floorspace and Partnerships	Moderate	Moderate
	Accessibility and inclusivity	Slight	
	Positive Health and Wellbeing		Significant
	Public Open Space		Significant
Environmental	Reuse PDL	Substantial	Substantial
	Sustainable location and transport	Significant	Significant
	Biodiversity	Moderate	Significant
	Sustainable Design	Significant	Moderate
Harms			
TOPIC	DETAIL	LPA (Andrew Martin)	Applicant (Guy Kaddish)
Townscape		Slight	Very Limited
Heritage		Significant	Limited
Residential		Substantial	Limited (lower end)

APPENDIX 2

TOWNSCAPE REBUTTAL

Townscape Rebuttal Appendix

Code Reference	Code Text
Thresholds	
2.3.12	Thresholds <i>must</i> be designed to soften the transition between the existing context and the central spaces of the masterplan
Character Areas	
2.9.5	All character areas <i>must</i> support the retention of existing trees wherever possible.
2.9.7	All character areas <i>must</i> include a tree planting strategy with a focus on mature size, biodiversity and climate resilience informing the selection.
Street Typologies	
2.10.9	Abbey Grove <i>must</i> have a substantial green buffers with tree planting between the boundary to Silverwood Close and the main access road and between the main access road and the proposed buildings.
2.10.20	The Lanes <i>must</i> create an environment that mediates the relationship between the neighbouring residential properties and the new boundary streets
2.10.23	Street E <i>must</i> have a substantial green buffer with tree planting between the boundary to Rope Walk and Plot 7
2.10.24	Street E <i>must</i> have additional tree planting to screen views out of Plot 7 towards the neighbouring properties.
2.10.26	Street F <i>must</i> have a substantial green buffer with tree planting between the boundary to Rope Walk and Plot 8.
2.10.27	Street F <i>must</i> incorporate new tree planting to screen views out of Plot 8 towards the neighbouring properties
2.10.30	Street G <i>must</i> incorporate a substantial planting buffer to the St Matthew's Gardens boundary edge
2.10.33	Street H <i>must</i> create a new tree planting buffer zone to the Silverwood close boundary edge
2.11.0	Green infrastructure <i>must</i> form a part of the strategy for all landscape areas
2.11.1	The site <i>must</i> feel well integrated into the local area

2.11.4	The detailed design <i>must</i> optimise the retention of existing good quality existing trees
2.11.5	Proposed tree planting <i>must</i> support and enhance the street typologies, character areas, biodiversity and green infrastructure.
2.11.6	The site <i>must</i> exceed Biodiversity Net Gain policy targets
2.13.0	Individual and groups of trees to the boundaries <i>must</i> be retained and enhanced where appropriate
2.13.1	Where any removal of existing trees is justified to support the delivery of the design principles and character areas, then compensation on site <i>must</i> be provided.
Massing	
3.1.0	Proposals <i>must</i> collectively create a coherent place comprised of buildings that form a responsive and positive contribution to the skyline of Cambridge and respect relevant policy views and key landmarks
3.1.3	Each building <i>must</i> respond to adjacent buildings in scale and character and avoid visual coalescence of massing and built forms
3.1.5	Buildings adjacent to each other <i>must</i> complement one another through similar proportions, architectural elements and rhythmic composition.
3.1.6	Buildings <i>must</i> employ a modulated approach to the massing, breaking down large footprints into smaller, more distinct architectural entities
3.1.7	Subdivided volumes <i>must</i> be articulated to be visually distinct, create visual interest and reduce the perceived scale and bulk of the building.
3.1.9	Buildings <i>must</i> introduce variation in height and form between each other, and employ diverse roofscape solutions to create a sense of variety to their silhouettes
3.1.10	To avoid coalescence, roofscape articulation and massing breaks <i>must</i> be legible and appreciable in relevant local TVIA views from outside the site.
3.1.12	Buildings <i>must</i> use a diverse palette of high quality materials and façade treatments to enhance visual differentiation between massing volumes.
3.1.15	Unless otherwise qualified on the parameter plans, the upper AOD level for each building measured at parapet level and <i>must</i> include all building elements including roof top plant, lift overrun and PV. Flues are subject to their own maximum heights

Materiality	
3.2.1	This material selection process <i>must</i> be informed by local and city wide context
3.2.4	The materiality of taller elements of the Proposed Development <i>must</i> be contrasting, distinct from, or appropriately harmonious with historic tall elements so as to minimise competition with the historic core and to make legible the evolution of the skyline.
3.2.5	The material choices and proposed articulation <i>must</i> address texture, depth, identity and playfulness.
Façade Hierarchy	
3.4.0	All building façades <i>must</i> be thoughtfully designed, exhibiting design excellence regardless of hierarchy, and <i>should</i> create elevations that provide a 21st Century response to the rhythms and richness found in the character of Cambridge.
3.4.2	Facade design <i>must</i> be carefully designed to create varied architectural silhouettes
Rooftops	
3.5.0	The rooftops <i>must</i> be varied in character across the character areas.
3.5.1	The articulation of rooftops <i>must</i> mitigate massing impacts in local and townscape views, as identified in the townscape visual assessment chapter of the Environmental Statement.
3.5.3	Rooftop plant <i>must</i> be well considered and integrated into the overall roof character to create a coherent and attractive architectural composition.
3.5.4	Buildings <i>must</i> have an uncluttered roof profile with all functional elements forming an integral part of the overall building forms
3.5.6	To mitigate the coalescence of buildings in townscape views a variety of materials <i>must</i> be used on the top floors to create distinction between buildings.
3.5.7	The combined roof profiles of Plots 2, 3, 4 and 5 <i>must</i> create a varied roofscape when viewed from Coldham's Common.
3.5.8	Rooftops of neighbouring plots <i>must</i> be varied in articulation and tone when viewed from Red Meadow Hill and Castle Hill Mound.

Rooftop Plant	
3.6.0	Significant efforts have been made throughout the outline application process to minimise rooftop plant whilst maintaining suitable building performance and allowance for the long-term adaptability of the buildings. It <i>must</i> be demonstrated how the footprint required for rooftop plant has been minimised at the outset of any RMA
3.6.1	It is proposed that there are a number of approaches to the design of rooftop plant areas as defined below. Reserved Matters applications <i>should</i> follow these where appropriate, with alternative proposals to be allowed which minimise visual impact in TVIA views provided that architectural quality is not compromised
3.6.10	Efforts to create variation of form at parapet level (whether roof or terrace) will be encouraged and Reserved Matters applications <i>must</i> include exploration of how this may be appropriately incorporated into designs, with the proposed solution supported by evidence.
Flues	
3.7.0	It <i>must</i> be evidenced at the outset of any Reserved Matters Application that the footprint and height of any flues has been minimised without incurring compromise to building function or future flexibility.
3.7.1	Flues <i>must</i> be a positive contribution of incidents on the skyline of Cambridge and not compete with the historic landmarks.
3.7.4	The design of any flues <i>must</i> be fully integrated with the architectural strategy for the building and create an opportunity for high quality architectural expression at roof level.
Character Areas	
4.1.1	A diverse and resilient green buffer zone, planted with trees, <i>must</i> be created to act as a green screen to the neighbours of Silverwood Close.
4.1.2	Abbey Grove must create an area with significant tree planting, retained and new, between the access road and the new building frontages,
4.3.5	Maple Square <i>must</i> create areas for tree planting, retained and new.
4.4.5	Hive Park <i>must</i> create an area with significant tree planting.
4.5.2	A diverse and resilient green buffer zone, planted with trees, <i>must</i> be created to act as a green screen to the neighbours of York Street, Silverwood Close and St Matthews Gardens.
4.5.3	The Lanes <i>must</i> create areas for tree planting, retained and new, in all new streets

Plot Specific Codes: Plot 1	
5.1.0	The architecture <i>must</i> contribute positively to the street scene of Coldham's Lane
5.1.1	The building <i>must</i> reduce in height towards the boundary with Silverwood Close as defined in the Parameter Plans to create the sense of a 2 storey form to the rear and to mitigate amenity impacts.
Plot Specific Codes: Plot 2	
5.2.0	The building <i>must</i> contribute to creating a high quality, exciting and attractive urban street composition that corresponds with its prominence, visibility and arrival role into the development.
5.2.1	The proposed form and frontages <i>must</i> suitably break down the length of the Coldham's Lane frontage into distinct smaller volumes.
5.2.2	The location and appearance of the flue <i>must</i> be tested from Castle Hill Mound, Coldham's Common and Red Meadow Hill viewpoints to mitigate the impact on the skyline.
5.2.6	The building elevations <i>must</i> deliver exemplar context responsive urban laboratories with unique, layered, human scale façade compositions to create visual interest and complexity.
5.2.7	Facade designs <i>must</i> take into account the appearance of the building when viewed from Castle Hill mound and be evidenced.
5.2.8	The architectural treatment <i>must</i> break down the length of the facade facing Coldham's Lane.
Plot Specific Codes: Plot 3	
5.3.0	The proposed architecture <i>must</i> break down the horizontality of the Abbey Grove frontage.
5.3.1	The building <i>must</i> positively contribute to the street scene of the Beehive Greenway
5.3.2	The location and appearance of the flue <i>must</i> be tested from Castle Hill Mound, Coldham's Common and Red Meadow Hill viewpoints to mitigate the impact on the skyline
5.3.3	The building <i>should</i> be broken by a central massing break that separates the building into two elements that could be architecturally distinct from each other.
5.3.5	The massing break <i>should</i> be of a lower height than the elements to either side.
5.3.6	There <i>should</i> be a step in the facade at plant level to create variation and depth in the roofscape.

5.3.11	The building <i>must</i> positively contribute to the character of the Beehive Greenway corridor in conjunction with the other buildings that bound the route.
Plot Specific Codes: Plot 4	
5.4.0	The building <i>must</i> positively contribute to the street scene of the Beehive Greenway
5.4.1	The building <i>must</i> achieve variation in roof form in conjunction with its neighbouring plots.
5.4.2	The building <i>must</i> enable a varied skyline for the whole development when viewed from Coldham's Common.
5.4.3	The upper levels of the building <i>must</i> be set back as defined in the maximum building heights and plots parameter plan in order to create variation and depth within the roofscape and to create appreciable differentiation from the massing of Plot 5.
5.4.4	The form <i>must</i> be tested from Coldham's Common viewpoints to ensure that a varied profile is achieved in conjunction with neighbouring plots.
5.4.7	The building <i>must</i> achieve differentiation in roof-form and facade treatment from Plots 3 and 5
5.4.8	If Plot 4 Reserved Matters follows the granted Reserved Matters of Plot 10, the application <i>must</i> evidence how Plot 4's upper level materiality appropriately contrasts the upper levels of Plot 10 to reduce bulk in the wider townscape viewpoints, especially Castle Hill Mound and Red Meadow Hill
Plot Specific Codes: Plot 5	
5.5.0	Plot 5 will be the highest point of the proposals and so careful consideration <i>must</i> be given to ensuring that the building integrates harmoniously without dominating the Cambridge Skyline
5.5.1	The building <i>must</i> be carefully designed to respond to its impact on the skyline of Cambridge. Townscape testing <i>must</i> be undertaken for the building for policy views, especially Castle Hill Mound and Red Meadow Hill.
5.5.2	The location and appearance of any flues <i>must</i> be tested from Castle Hill Mound, Coldham's Common and Red Meadow Hill viewpoints to mitigate the impact on the skyline
5.5.3	The building <i>must</i> be broken by a central massing break that separates the building into two elements that could be architecturally distinct from each other.

5.5.4	Massing breaks that create distinct building volumes <i>must</i> be legible on the front and rear elevations.
5.5.5	The massing break <i>must</i> be of a lower height than the elements to either side.
5.5.6	There <i>must</i> be a step in the facade at plant level to create variation and depth in the roofscape
5.5.10	The building <i>must</i> achieve variation in roof form in conjunction with its neighbouring plots to avoid coalescence
5.5.11	The building <i>must</i> enable a varied and sensitive skyline when viewed from Coldham's Common and Castle Hill Mound.
5.5.12	The building <i>must</i> possess a distinctive design that sets it apart as a marker building within the new development, embodying a 21st Century response to form and use that draws on the rhythms and richness found in Cambridge
5.5.13	The materiality, form and articulation <i>should</i> contribute to a breaking down of the building volume into distinct smaller elements and contribute to the reduction of horizontality.
5.5.14	The building <i>must</i> achieve differentiation in roof-form and facade treatment to Plot 4.
5.5.15	If Plot 5 Reserved Matters follows the granted Reserved Matters of Plots 6 and 9, the application <i>must</i> evidence how Plot 5's upper level materiality appropriately contrasts the upper levels of Plots 6 and 9 to reduce bulk in the wider townscape viewpoints
Plot Specific Codes: Plot 6	
5.6.0	The building <i>must</i> break down the horizontality of the mass
5.6.1	The location and appearance of the flue <i>must</i> be tested from Castle Hill Mound, Coldham's Common, Red Meadow Hill and York Street viewpoints to mitigate the impact on the skyline
5.6.2	The building <i>should</i> have a 3 storey wing that is architecturally distinct from the taller building elements.
5.6.12	If Plot 6 Reserved Matters follows the granted Reserved Matters of Plot 5, the application <i>must</i> evidence how Plot 6's upper level materiality appropriately contrasts the upper levels of Plot 5 to reduce bulk in the wider townscape viewpoints, especially Red Meadow Hill and Little Trees Hill

Plot Specific Codes: Plot 7	
5.7.0	The building <i>must</i> break down the horizontality of the mass
5.7.1	The building's appearance <i>must</i> be tested from the York Street viewpoint to mitigate the impact on the Conservation Area.
5.7.2	The building <i>must</i> break down the length of the long facade facing Hive Park
5.7.3	The building <i>must</i> respond to its immediate context, the Mill Road Conservation Area and the residential areas on the boundary
5.7.4	The building <i>must</i> have a 3-storey edge on façades on the boundary, as defined in the Maximum Building Heights and Plots Parameter Plan.
5.7.5	The building <i>must</i> include setbacks at 3rd floor and roof level as minimum in order to reduce the apparent height and volume of the building
5.7.14	Design strategies to positively address and manage the change in scale between the building and the neighbouring Conservation Area <i>must</i> be evidenced within Reserved Matters applications.
5.7.15	Rooftop plant screening will be visible from the Conservation Area and so <i>must</i> be of a high quality with a suitable level of articulation
Plot Specific Codes: Plot 8	
5.8.0	The building <i>must</i> respond to its immediate context, the Mill Road Conservation Area and the residential areas on the boundary
5.8.1	The building <i>must</i> have a 3-storey edge on façades on the boundary, as stated in the Maximum Building Heights and Plots Parameter Plan
5.8.7	The architectural treatment <i>must</i> break down the length of the long facade facing St Matthews Gardens
5.8.8	Design strategies to address the change in scale between the building and the neighbouring Conservation Area <i>must</i> be evidenced within Reserved Matters applications
Plot Specific Codes: Plot 9	
5.9.0	The building <i>must</i> have a 3-storey edge on façades on the boundary, as stated in the Parameter Plans
5.9.8	If Plot 9 Reserved Matters follows the granted Reserved Matters of Plot 5, the application <i>must</i> evidence how Plot 9's upper level materiality appropriately contrasts the upper levels of Plot 5 to reduce bulk in the wider townscape viewpoints, especially Castle Hill Mound.

Plot Specific Codes: Plot 10	
5.10.1	This plot occupies a central location which terminates long views into and across the site and as such <i>must</i> be a well-considered, cohesive hybrid building that successfully integrates the proposed mix of uses.
5.10.15	The proposed building <i>must</i> feature architecture that is high quality with high quality materiality and articulation that addresses the visibility of the building in local and long distance views
5.10.16	The facade <i>must</i> feature variation of materiality and articulation in order to subdivide the building volume into smaller distinct elements and to respond to the hierarchy informed by the Legibility Strategy.

APPENDIX 3

DAYLIGHT & SUNLIGHT - AMENDMENTS

Flats at 159 / 161 St Matthew's Gardens

159 St Matthew's Gardens							
Floor	Use	Numerical Reduction Parameter Scheme			Illustrative Scheme		
		VSC Impact	Retained VSC	NSL Impact	VSC Impact	Retained VSC	NSL Impact
G	L/K/D	Minor	25.3%	Negligible	Negligible	>27%	Negligible
G	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
G	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
G	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
G	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
161 St Matthew's Gardens							
Floor	Use	Numerical Reduction Parameter Scheme			Illustrative Scheme		
		VSC Impact	Retained VSC	NSL Impact	VSC Impact	Retained VSC	NSL Impact
1	L/K/D	Moderate	26.1%	Negligible	Negligible	>27%	Negligible
1	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
1	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
1	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
1	Unknown	Negligible	>27%	Negligible	Negligible	>27%	Negligible
Impacts							
Ground and first floor flats to eastern end of St Matthew's Gardens terrace. 159 experiences a minor VSC deviation to a single ground floor living space and no material effect on NSL. 161 experiences a moderate VSC deviation to a single first floor living space. No material effect on NSL.							
Acceptability / Adequacy							
Retained amenity levels of over 25% VSC are very good. All other rooms meet absolute target of over 27% VSC. Overall use and amenity of the space will not be materially impacted. Trees / bushes to the boundary will reduce the perception of light loss. Not all rooms to this property experience change as a result of the proposals with the northern elevation being unaffected. Sunlight levels fully meet the APSH sunlight test. Retained amenity resulting from the parameter scheme is considered to be adequate. No material harm under illustrative scheme demonstrates effectiveness of design controls in further minimising effects.							

Table 3: Summary of effects – 159 / 161 St Matthew's Gardens

Flats at 177 – 201 St Matthew's Gardens

177-201 St Matthew's Gardens							
Floor	Use	Numerical Reduction Parameter Scheme			Illustrative Scheme		
		VSC Impact	Retained VSC	NSL Impact	VSC Impact	Retained VSC	NSL Impact
LGF – 179	Living	Negligible	11.4%	Moderate	Negligible	12.2%	Negligible
LGF – 177	Living	Negligible	11.3%	Major	Negligible	11.8 %	Minor
G – 183	Bedroom	Minor	20.4%	Major	Negligible	23.5%	Minor
G – 181	Bedroom	Major	17.8%	Major	Minor	21.2%	Moderate
1 – 185	Bedroom	Moderate	22.5%	Minor	Minor	25.5%	Negligible
1- 189	Bedroom	Major	19.8%	Major	Moderate	23.1%	Minor
2- 195	Bedroom	Minor	25%	Negligible	Negligible	>27%	Negligible
2- 191	Bedroom	Moderate	22.1%	Moderate	Minor	25.4%	Negligible
3 – 201	Bedroom	Minor	22.1%	Negligible	Negligible	24.6%	Negligible
3- 197	Bedroom	Moderate	19.1%	Minor	Minor	22.2%	Negligible
Impacts							
The flats at 177 – 201 St Matthew's Gardens 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 facing the site but no main living rooms. 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 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.							

Acceptability / Adequacy
Retained amenity levels of c.18% and higher are appropriate for the bedroom uses at ground floor and above. Whilst there are NSL changes to these bedrooms, they are a more secondary space and this will 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 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 will 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. The majority of effects are to bedroom spaces whilst the lower ground floor living spaces are already somewhat constrained. The more limited effects under the illustrative scheme demonstrates effectiveness of design controls in further minimising changes resulting in only minor to moderate changes in effects.

Table 8: Summary of effects – 177-201 St Matthew's Gardens

