

PLANNING PROOF OF
EVIDENCE -
APPENDICES
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BSC (HONS) DIP TP MRTPI

APPENDIX 1

PLANNING APPLICATION CONSULTEE COMMENTS

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- 1.1 This appendix provides an account of the consultee comments to the planning application. It lists those that raise no objection and briefly addresses the three non-statutory consultee objections to the proposals and how these are addressed and overcome in the determination of the application.
- 1.2 As set out in Section 8.0 of the Planning Committee Report (CD3.01), the application proposals have been subject to extensive consultation by the Council with all relevant statutory consultees. In summary, there is no objection from the following parties:
- Anglian Water
 - Active Travel England
 - Cambridge City Airport
 - Cambridge Fire & Rescue Services
 - County Archaeology Team
 - County Highways Development Management
 - County Highways Transport Assessment Team
 - Designing out Crime Officer (Cambridge Constabulary)
 - Ecology Team
 - Environment Agency
 - Environmental Health Team
 - East West Railway Company
 - Health and Safety Executive
 - Historic England¹
 - Landscape Design Team
 - Lead Local Flood Authority
 - Ministry of Defence (Infrastructure Safeguarding Team)
 - Natural England
 - Sustainability Team
 - Urban Design Team²

¹ Historic England objected to the application in its initial form, but in response to the re-submitted material, decided that it did not wish to offer any advice.

² It is noted that the 'no objection' in the 12.12.2024 consultee response from the Urban Design Officer was subject to further daylight and sunlight investigations saying 'While we are still of the view that the wording we suggested in our previous comments is more suitable, we are aware that further investigations of the impacts of Daylight and Sunlight on existing properties is currently being undertaken, and therefore subject to this further work, and the conditions recommended in our previous comments, urban design do not object to the application'.

Objections were raised by the following internal consultees, but the matters of concern raised are fully resolved through a reading of the development plan as a whole and when considered in the planning balance against the benefits of the scheme. To address each of these objections:

- **Arts Development Officer** – A Public Art Strategy formed a part of the planning application. It presents a strategy from which Detailed Public Art Plans would be prepared and approved following a grant of planning permission. This will be controlled through the s.106 agreement. The strategy does not fix what the detailed art proposals will be, these will be determined through a collaborative and iterative public art process. Section 26 of the Committee Report (CD3.01) deals with this matter and concludes at Paragraph 26.10 that:

Overall, the PAS [Public Art Strategy] provides a positive foundation upon which a high quality and distinctive new location within the City will be created. Whilst there remain some areas of concern relating to the details of the individual public art commitments being made it is considered that these aspects would be capable of resolution’.

The Public Art proposals are acceptable.

- **Conservation Team** – An objection is lodged by the Conservation Team as referenced at Paragraph 8.19 of the Committee Report. The objection arises because the Conservation Officer concludes that there is some less than substantial harm. As dealt with in the Development Plan and Planning Balance Section of my evidence, this is a matter to consider through NPPF Paragraph 215 and to weigh the harm against the planning benefits. When this balancing exercise is undertaken the harm is outweighed.
- **Tree Officer** – The Tree Officer objects to the removal of two trees under a Tree Protection Order (TPO), although does give support to other aspects of the proposal. The loss of the trees arises out of a holistic approach to the development of the Site including the formation of a Landscape Strategy, which includes for consideration of existing and proposed trees, to create a much-improved planted landscape across the whole Site. The Committee Report concludes on this matter at Paragraph 19.8

To summarise, while objecting to the removal of trees T77 and T78, which are subject to TPOs, the Tree Officer is otherwise broadly supportive of the revised application due to the increased spaces for new strategic tree planting. In summary, whilst officers recognise that trees will be lost, including two TPO’d trees, their removal is necessary to facilitate the proposed development and would be more than adequately compensated through the new tree planting and wider landscaping proposals. The proposed development therefore complies with Policies 59 and 71 of the CLP, in addition to the relevant objectives contained within the NPPF.

The loss of trees is considered acceptable in policy terms and the Proposed Development complies with Policies 59 and 71.

APPENDIX 2

PLANNING BENEFITS TABLE



PLANNING BENEFITS TABLE

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
ENVIRONMENTAL BENEFITS			
Reuse of urban brownfield land for identified needs	The Site is previously developed land (PDL)(brownfield land) in a sustainable location in the heart of the city. The Development Proposals represent an efficient use of land, while forming a development of the highest quality that will create significant beneficial impacts across the three objectives of sustainable development: environmental, social and economic. The Site's location provides an opportunity to drive down carbon associated with travel, as it is within easy access of key transport interchanges which will be bolstered by improvements to the walking and cycling network. This will be further enhanced with a significantly improved public transport service, including direct access to the development by bus. A positive, transformative reimagining of the site in a sustainable location is supported by national planning policy, adopted Local Plan policy and by the emerging Joint Local Plan. The redevelopment of urban brownfield land for identified needs is a matter of substantial weight in accordance with NPPF Paragraph 125(c).	Design Code Parameter Plans Planning Conditions/S.106 All Phases	Substantial
Ecology, including Biodiversity Net Gain and Tree Planting	The scheme design includes for ecological enhancement as a key part of the masterplan and to help create a much-improved place. The proposals include a significant increase in biodiversity net gain (BNG), a net increase in trees and well-considered planting to create an enhanced landscape which allows for ecology to thrive all year-round. The habitats to be created are informed by local habitat priorities. BNG The Proposed Development will achieve in excess of the 20% Biodiversity Net Gain (BNG)	Ecology Report BNG Assessment Parameter Plans Planning Conditions/S.106 All Phases	Significant

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	that is sought locally by the Council's Biodiversity SPD (CD4.08) and targets an increase of over 100% BNG. This will be achieved through the creation of new habitats, including a pond; tree and hedge planting; biodiverse planting at site boundaries; and green / brown roofs on the new buildings. Increase in Number, Quality and Longevity and Trees The Proposals retain 58 existing trees on the Site, remove 61 existing trees and add approximately 290 new trees. Those trees to be removed are informed by an Arboricultural Assessment and are predominantly the smaller trees throughout the existing surface car park. The larger trees along the site boundary are largely retained and will be part of the committed long-term landscape management strategy. Strategic tree planting will include long-term growing species to ensure a strong tree legacy and one superior to the current context. Species will be chosen for their climate resilience. The planting strategy will achieve a significant enhancement for ecology, character and public enjoyment. Strategy for Species-Specific Benefits The pollen-rich planting incorporated into the proposed habitat will provide essential food resources for pollinators such as bees, butterflies, moths, beetles, and flies. By offering a diverse range of flowering plants, this will help sustain healthy and thriving pollinator populations. Additionally, the presence of pollinators will serve as a vital food source for bat, bird, and small mammal species. The development will provide nesting and roosting boxes for bats and birds in line with the Biodiversity SPD.		
Reduction in Vehicle Trips and Enhanced Sustainable Travel	The transport strategy aligns with, and supports, the authorities' aspirations for greatly improved sustainable transport to reduce reliance on private car usage. This provides, directly or via	Travel Plan Planning Conditions/	Significant

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	S.106 contributions or planning conditions, a range of measures including: - Reduced Car Parking - The development reduces on-site car parking by 55% from 885 to 395 spaces and reduces the level of use of the car parking at the site. Access to parking will be closely controlled to ensure it is used on a needs-basis. - Reduced Car Trips - The Proposed Development will result in a significant reduction in car use associated with the site by removing up to 10,000 two-way movements per weekday and 12,000 per weekend day. - On-site design priorities - The Site, currently dominated by surface car parking, will be reimagined, creating a series of legible and attractive streets and spaces made for people and not the car. The ground level has been designed to prioritise cyclists and pedestrians, with private cars (except for some disabled spaces) constrained to a single parking location in proximity to the Site's single vehicular entrance from Coldham's Lane. The masterplan improves pedestrian and cycle access into and through the Site, linking into established routes, and will deliver secure cycle parking and end-of-trip facilities. - Enhanced cycle provision - Safer, higher capacity cycle routes designed to LTN 1/20 standards will provide links to the strategic cycle network including the extension of the Chisholm Trail (a strategic cycle route to be delivered across the city). Exemplary cycle parking will be provided in convenient locations, catering for all types of cycles; covered, safe, and secure. Changing and showering facilities will be provided in all buildings.	S.106 All Phases	

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	- Public Transport and Sustainable Transport Mode Share - Staff and visitor trips to and from the Site will be facilitated by a much-improved public transport service (increased Park and Ride frequencies and new bus routes), and enhanced walking and cycling routes. The relocated and enhanced bus stop within the Site will include public transport/network information, supported by wayfinding signage. Public transport provision will be monitored, reviewed and managed through a progressive and targeted site-wide Travel Plan, to serve future employees/visitors to the Site but also to the benefit of the wider community. - Off-site and wider benefits - The strategy removes barriers to walking, cycling and public transport use not just within the Site but also within the surrounding area. This benefits users of the Site, local populations and promotes more sustainable travel more widely within Cambridge. - Entry points into the Site will be considerably improved from their existing condition. This will include the design of a new junction at Coldham's Lane, the primary point of access to the Site.		
Sustainable Design and Strategies for Construction and Operational Stages	The Site has and will continue to champion sustainability in all forms through adopting a 'five capitals' approach covering physical, social, economic, human, and natural elements of the design. These principles are embedded into the design and development proposals and will be achieved by exceeding the standards noted below. Construction Embodied carbon (the carbon associated with the construction materials) contributes a significant portion of a building's carbon footprint and so optimisation of material usage will drive this down, leading to a lower carbon	Sustainability Strategy BREEAM Assessment Energy Strategy Construction and Environmental Management Plan Planning Conditions	Moderate

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	development. In addition, the passive design of the buildings will facilitate future operation and thermal comfort. 1. A target is included for embodied carbon to be less than 600kgCO₂e/m² for office buildings and 750 kg CO₂e/m² for labs to ensure betterment of the LETI 2020 Design Target. 2. Reducing waste throughout the construction process – diverting waste from landfill and re-using materials where possible and at end of life – a monitored and reported approach, including completing assessments to assess ease of disassembly. Both elements will accord with the Material 06 and Waste 01 and Waste 06 BREEAM Credits methodologies. 3. All contracts with suppliers will include for the Considerate Constructor Scheme, or a similar style programme, to minimise construction impact. 4. The development will adopt a strict sustainable sourcing strategy for materials used in line with industry best practice, which will be monitored and reported. 5. The sustainability strategy and benchmarks will be included within the construction procurement process. Energy Low operational carbon will be targeted through an all-electric scheme. The proposal optimises systems to improve building performance and in turn drive down the overall energy use arising from the site. 1. Achieve BREEAM Outstanding shell and core certification for offices – over 85% of the BREEAM criteria will be achieved along with meeting or exceeding targets relating to project management, energy, water usage, materials used and waste management. The remaining buildings (excluding the MSCP element of Building 10) will all achieve a minimum	All Phases	

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	BREEAM certification of 'Excellent', with a push target to achieve Outstanding. 2. Maximise photovoltaic panels across the roof areas to generate renewable energy for the site. 3. Detailed Prediction of Operational Energy calculations for how the buildings will perform at base build with targets set against the RIBA Climate Challenge 2030 and LETI targets. Air Quality The development will adopt air quality requirements in line with the RIBA Climate Challenge 2030. The development will not use fossil fuel as an energy source, and vehicle movements will be much lower than existing, improving local air quality. The provision of Electric Vehicle Charging Points (EVCPs) will also promote reduced emissions. Water Water consumption is key to a successful development. All five Wat 01 credits of BREEAM plus the additional exemplary credit are planned for the development to meet the highest standards for limiting water usage– this means that the development water usage is significantly below a baseline model (65% minimum betterment) and rainwater harvesting will be incorporated to further mitigate high water usage intensity. This will exceed Cambridge City Council requirements.		
SOCIAL BENEFITS			
Creating a Better Place for People to Experience and Enjoy	The masterplan for the redevelopment of the Beehive Centre creates new streets and open spaces that combine with a local centre set to provide facilities such as shops, services, cafes, and leisure spaces. This will create a new part of the city that provides a vibrant new local centre for the local community, notably for Abbey, Petersfield, and Romsey wards.	Parameter Plans, Local Centre Strategy, Community Outreach Strategy and Public Realm Management Strategy,	Great

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	The new local centre is designed to be used and enjoyed by everyone, with no barriers to access. Partnerships with local groups will help to create areas and spaces of interest for a wide range of people. The masterplan has been developed for the buildings and the landscape to work in tandem, to create a vision for a place that can act as: • A useful local shopping destination with a retail mix informed by local people and interest groups, including IndieCams. The local centre will be a facility that adds to the variety of amenities available to the local community. • A place to come and enjoy open spaces alongside active buildings. • An inclusive place, incorporating design inputs from partners such as Red2Green and Make Space for Girls. • A social hub with a programme of events within the community space and the new public open spaces. • A place to be active, supported by initiatives such as Cam Skate's 'Skate the Streets'. • An attractive place to come to work, with opportunities at all skill levels. The Local Centre Strategy and Public Realm Management Strategy ensure that the new local centre will add to and complement the wider local offer. The Development will deliver an exceptional and significant new public amenity via extensive and high quality, accessible public realm. The landscape design has been developed in conjunction with the buildings and ground floor uses to allow the inside and outside spaces to work together to create an active and vibrant public realm. The distinct character areas, set within a unified ground plane, add variety and	Wayfinding Strategy, Public Art Strategy Planning Condition/S.106 All Phases	

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	choice to the lived-experience of being in the landscape. The high-quality spaces provide opportunity for a wide range of user groups to enjoy the public spaces, which in turn will contribute to the local centre by encouraging interaction and fostering a sense of community. The Public Art Strategy will facilitate a site-wide approach to the delivery of public art, including community engagement. This will enhance place-making on the Site in addition to enhancing local partnerships.		
Hive Park, Public Open Space and Informal Recreation Provision	The masterplan includes 2.6 hectares of open space, comprising a range of provision to cater for the whole community. Except for the designated ecology area and servicing yards, all other external spaces will be accessible to the public without gates or any other barriers. Hive Park (7,000 sqm) will provide a large south-facing public park which will provide informal recreational space, permanently open for the use of the wider community as well as employees on the Site. Hive Park will be situated adjacent to the southwestern entrance to the Site (from Sleaford Street), easily accessible by the local community. The new open space provision will provide an additional resource, more so, for the residents of Abbey, Romsey and Petersfield wards. This responds directly to the needs of the local area – the Council's Open Space and Recreation Strategy (2011)(CD4.03) provides baseline information on existing provision across the city. It finds that the provision of informal open space is particularly low in four wards, including both Romsey and Petersfield. It states that in Romsey, the amount of informal open space is low given the local population density and the amount of natural and semi natural green space is very low. In Petersfield, it concludes that there is a limited amount of Protected Open Space, of which approximately two-thirds is publicly accessible.	Parameter Plans Public Realm Management Strategy Wayfinding Strategy Planning Condition/S.106 All Phases	Significant

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	The provision of accessible, open and useable public space is a significant benefit that responds to the needs of the local area, as well as some of the leading issues arising from stakeholder engagement.		
Community Floorspace and Local Partnerships	The proposals include for a number of specified community facilities arising out of local engagement and stakeholder discussions. Listed below are some of the community-related issues and needs identified through pre-application engagement – as set out in the Social Infrastructure Strategy by Volterra (2024)(CD2.07): <i>Relationship between people and place:</i> • There is a lack of facilities for young people (7-18-year-olds), such as skate parks. • Romsey ward is described as lacking a library, benches to socialise, a community centre that is welcoming to everyone. • While the greater focus has been on the provision for young people through consultation, the proposals ensure that the provision will cater for everyone and all ages. <i>Making a unique place that does not replicate what works locally:</i> • Residents expressed little interest in replicating what is already working in the local area. <i>Creating an interactive and welcoming space where people can meet, exchange, and learn from each other:</i> • Stakeholders noted there was a social divide between Abbey Ward and Petersfield Ward residents. These issues underpin the inclusion of the specialised community uses that the Proposed Development will deliver, including: Community and Youth Space	Parameter Plans Social Infrastructure Strategy Community Outreach Strategy Planning Conditions and S.106 Elements delivered by the completion of 50% Commercial Floorspace: • Youth and Community Space • STEM Education Space Elements delivered on a phased basis in accordance with an agreed programme: • Skate the Streets	Moderate

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	Railpen has worked with a number of local organisations, including Abbey People, Cambs Youth Panel and Romsey Mill, to guide the design of a new community and youth space at the Beehive Centre. The Proposed Development will deliver approximately 200 sqm (GIA) community and youth space including a flexible room for meetings and activities, supported by common space for gathering plus a kitchenette, office and WC. STEM Educational Space Railpen and Cambridge Science Centre are working together to create a new STEM educational space at the Beehive. The Proposed Development will deliver a STEM centre including flexible learning space extending to circa 200 sqm (GIA) located in the heart of the Development. Skate the Streets Railpen has partnered with Cam Skate to incorporate skateboarding and roller skating provision within some of the external open space, through the integration of skateable features into an area of the built environment. Consultation sessions with local skaters of all ages and abilities mean that architectural features and spaces will be designed with the input of the people who will use them, ensuring the plans meet the needs of skaters and pedestrians. The need for skating facilities is demonstrated by CamSkate occupying 3-5 Coldham's Lane as a meanwhile use. This is a building in Railpen ownership to the opposite side of Coldham's Lane. CamSkate is temporarily occupying it to provide skating facilities and it has proven to be most popular.		
Positive Health and Wellbeing Impacts	The operational phase of the Proposed Development is expected to create a positive health impact across the following list of health determinants, as set out in the Health Impact Assessment within the EIA (CD2.46):	Health Impact Assessment Planning Condition/S.106	Significant

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	- Access to open space and nature - There is a significant uplift of open space on site, providing 2.6ha. The majority will be publicly accessible and targeting at least 100% BNG. These spaces can contribute a positive impact on health and wellbeing for its users. - Accessibility and active travel - The proposal includes measures to encourage walking, cycling and reduce the reliance on cars, by providing improved facilities such as cycle routes, a new pedestrian environment and a mix of cycle parking. This will result in significant transport mode shifts, all of which positively impact health. - Crime reduction and community safety - the Proposed Development incorporates various crime prevention measures such as increased natural surveillance, continuous use of spaces (day and night), on-site security and secure design principles. All of these measures contribute to a safer environment which has a positive wellbeing and health impact. - Air quality, noise and neighbourhood amenity - The Proposed Development will have a positive impact on air quality when compared to the existing site because of the reduction in average daily traffic. - Access to a variety of food and drink - The Proposed Development will deliver cafes and restaurants on-site which would meet the needs of the local community and building occupants. - Access to work and training - The Proposed Development will support significant employment in the operational phase. The Applicant has committed to using reasonable endeavours to maximise opportunities for local jobs and skills within a	All Phases	

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	comprehensive Employment and Skills Strategy. • Social cohesion and inclusive design - The Proposed Development will include community facilities, open spaces and a new local centre, all designed to support social interactions and creating a welcoming, accessible and vibrant place for all.		
ECONOMIC BENEFITS			
Meeting an identified need for Office and Laboratory Floorspace	There is a shared understanding with Cambridge City Council that significant challenges exist in meeting the identified quantitative and qualitative need for key sectors, including life sciences and Information and Communication Technology (ICT). Mr O'Byrne's Economic Proof of Evidence shows that these needs are greater than currently published evidence suggests, and the existing pipeline is less certain. The Proposed Development directly addresses this shortfall by delivering at scale (approximately 88,750 sqm NIA) in an accessible urban location, precisely where occupier demand is strongest. It also broadens genuine market choice, is deliverable, and commits to a strategy for supporting start-ups and scale-ups, subject to market demand and viability. This benefit is fully supported by paragraph 85 of the NPPF, which places significant weight to supporting economic growth and productivity benefits. Paragraph 85 gives additional emphasis to high-performing locations, stating: <i>"This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."</i> Given the clear strategic alignment and substantial scale of provision to be delivered	Through the grant of Planning Permission	Great

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	through the Proposed Development, it is appropriate to give this benefit great weight.		
Contribution to the Cambridge Cluster	The Proposed Development will strengthen Cambridge's role as one of the UK's few truly world-class innovation ecosystems, a status explicitly recognised by national Government and reflected in the priorities of its Modern Industrial Strategy (CD9.13). By creating critical mass of wet lab, dry lab, and office capacity within an amenity-rich, edge-of-centre location, it will directly reinforce the productivity-enhancing network effects and knowledge spillovers that characterise the Cambridge cluster. It will attract investment and attract global talent that would otherwise go to competing international hubs such as Boston and the Bay Area, ensuring that the associated economic gains are genuinely additional at the national level rather than simply displaced within the UK. The benefit is fully aligned with paragraph 87 of the NPPF, which explicitly supports the development of high-tech clusters, as well as with the government's stated mission to grow the Oxford–Cambridge innovation corridor. Given this clear national significance, alongside the long-term nature of the cluster effects that would be delivered, it is appropriate to give this benefit substantial weight, the highest weight in the schedule.	Through the grant of Planning Permission	Substantial
Employment Skills Strategy	The Applicant has volunteered a comprehensive Employment and Skills Strategy (CD2.05), which includes commitments to the Real Living Wage where practicable, targeted apprenticeships, proactive STEM outreach, an on-site educational space, and a dedicated Employment and Skills Coordinator. Specific details will be provided in Employment and Skills Delivery Plans submitted prior to development commencing and occupation of commercial units.	Employment and Skills Strategy S.106	Moderate

TOPIC	COMMENTARY	HOW / WHEN SECURED	WEIGHT ATTRIBUTED (SLIGHT, LIMITED, MODERATE, SIGNIFICANT, GREAT, SUBSTANTIAL)
	This strategy explicitly seeks to address documented local inequalities, including pockets of deprivation, lower skills attainment, and cost-of-living pressures in Abbey ward and wider Cambridge.		
Economic Impacts – Jobs, GVA, spending and tax	The Proposed Development will support a range of economic impacts including: • up to 6,450 on-site jobs and 7,130 net additional jobs once displacement and multiplier effects are included, with c. 4,640 of those expected to be taken up by Greater Cambridge residents. • annual GVA uplift of £600 million. • between £180 m – £240 m per year in wider tax receipts (income, VAT, corporation tax) plus £11.4m in business rates, of which 40% retained by Cambridge City Council. • employment across various skill levels, generating an additional 520 entry-level and 1,070 mid-level skilled jobs compared to the existing site. These benefits are great: the uplift in jobs compared to the existing site (5,590) alone constitutes a quarter of Cambridge's job creation target to 2031 (22,100).	Through the grant of Planning Permission	Great

APPENDIX 3

DEVELOPMENT MANAGEMENT POLICIES REVIEW



DEVELOPMENT MANAGEMENT POLICIES REVIEW

Cambridge Local Plan (2018), Strategic Objectives

STRATEGIC OBJECTIVE	RESPONSE
1. Contribute to the vision of Cambridge as an environmentally sustainable city, where it is easy for people to make a transition to a low carbon lifestyle. This means making best use of energy (including community energy projects), water and other natural resources, securing radical reductions in carbon emissions, minimising environmental impact and being capable of adapting to the impacts of climate change.	The principle of sustainability is foundational to the project brief. The Proposed Development is highly sustainable, as set out within the Sustainability Strategy, Energy Strategy, and associated documents. The Development will be fully electric and has been designed to be low carbon.
2. Be highly water efficient, contribute to overall flood risk reduction through water sensitive urban design, and help to improve the quality of the River Cam and other water features in the city.	The Proposed Development will achieve and exceed planning policy requirements in respect of water. It incorporates water attenuation, conservation and efficiency measures. Maximum sustainable water use BREEAM credits will be achieved, including for the exemplary credit.
3. Be of the highest quality, in terms of design excellence and innovation, addressing the development's impact upon its surroundings and embracing the principles of sustainable design and construction.	The Development is designed by Leonard Design Architects, an international practice with projects across a range of scales. They have extensive masterplanning, urban design and architectural experience. Design excellence is integral to the Development, reflecting the approach set out in the Framework and National Design Guide. The design evolution is set out in the Design and Access Statement (DAS) and DAS Addendum, and high-quality design through the reserved matters stages will be secured including through the Design Code. Technical assessments have advised the design iteration process, such that the Proposed Development responds positively to the Site context.
4. Contribute to the positive management of change in the historic environment, protecting, enhancing and maintaining the unique qualities and character of Cambridge, including the River Cam corridor, the city's wider landscape and setting, and its designated and undesignated heritage assets for the future.	The Site does not include any designated heritage assets, but the design team has been fully cognisant of being adjacent to the Mill Road Conservation Area and other identified designated and non-designated heritage assets. The impact of the Development upon designated and non-designated heritage assets has been carefully considered and the design evolution process has reflected the approach set out in paragraph 208 of the Framework, seeking to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
5. Protect and, where appropriate, enhance the character and quality of the Cambridge skyline.	Dealt with in main evidence.
6. Protect and enhance the landscape setting of the city, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multi-functional green spaces, and tree canopy cover in the city.	The Development comprises the efficient and effective use of previously development land (PDL) in a highly accessible and sustainable location. This reduces pressure on the Green Belt, countryside and green corridors for development. The Development will increase tree planting and soft landscaping, providing

	a significant 'greening' of the Site compared to the existing form.
7. Protect and enhance the city's biodiversity, network of habitats and geo-diversity.	The Proposed Development will achieve in excess of the 20% Biodiversity Net Gain (BNG) that is sought locally by the Council's Biodiversity SPD (CD4.08) and targets an increase of over 100% BNG.
8. Meet the housing needs of the city within its sub-region, delivering an appropriate mix of housing types, sizes and tenures to meet existing and future needs, including affordable housing	The Development reflects the Local Plan's strategic objective of providing for Cambridge's economic and employment land needs, building on its key role in the UK economy. It will deliver a mixed-use commercial scheme on a site that is not allocated for residential use.
9. Assist the creation and maintenance of inclusive, environmentally sustainable communities.	The Development is designed to be a place which is fully accessible to the public, with extensive open spaces and public buildings including a range of landscapes, shops, cafes and social areas. The scheme includes community space which will provide for a range of activities. Youth provision, education programmes, 'skateable' streets and deliver an inclusive environment that is welcoming to all.
10. Promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge's role as a world leader in higher education, research, and knowledge-based industries, while maintaining the quality of life and place that contribute to economic success.	The new office and laboratory floorspaces will be of a high standard and of a flexible format, to facilitate a range of occupiers. The Development will create an employment centre that delivers local jobs and training opportunities, alongside a number of social and community infrastructure benefits.
11. Support Cambridge's vibrant and thriving centres, with a varied range of shopping facilities in accessible locations that meet the needs of people living, working and studying in, or visiting, the city and its wider sub-region.	The Development will create a new local centre which will support the office and laboratory space and create high quality retail, leisure and recreation provision for the local community. In addition to providing for the employees within the Development, the local centre will add to and complement the existing local facilities.
12. Promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region.	The wellbeing of the users and visitors to the site will be benefited by the high-quality on-site provision of new formal and informal open space. The new open space provision will also provide for the wards of Abbey, Romsey and Petersfield residents – in the latter two wards the current open space provision is under supplied.
13. Be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.	The Proposed Development is located in a highly sustainable location and offers ambitious and high quality links to the rest of the city by bike, foot, public transport and the car. A suite of on and off site transport strategies will support a planned modal shift away from the private car use towards active and sustainable transport. The Proposed Development is within a 20 minute walk of the city centre and Cambridge Central Station and cycle routes would be capable of supporting wider initiatives such as the Chisholm Trail.
14. Ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure.	The need for digital connectivity in the modern workplace is essential. The scheme includes a strategy for appropriate forms of infrastructure to meet the sustainability demands of the current climate. The development additionally targets Wiredscore Platinum.

15. Promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.	The proposed development will deliver a higher quality sense of place and character than existing. Extensive consideration has been given to delivering community benefits.
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Cambridge Local Plan (2018), Relevant Development Management Policies

THE POLICY	RESPONSE
Policy 1 The presumption in favour of sustainable development	This policy reflects that of the NPPF, and the Proposed Development accords with the development plan when read as a whole, therefore the presumption in favour applies.
Policy 2 Spatial strategy for the location of employment development	The development is proposed to provide a significant contribution to the City's employment need including jobs across life sciences, research and development, administration, leisure, retail and more; all located in a highly sustainable location.
Policy 4 The Cambridge Green Belt	The site is previously developed land in an urban setting. The development will reduce pressure for any development on the Green Belt.
Policy 5 Sustainable transport and infrastructure	Dealt with in main evidence.
Policy 6 Hierarchy of centres and retail capacity	Dealt with in main evidence.
Policy 8 Setting of the city	The policy does not strictly apply because it is not on the urban edge, but nevertheless the development accords with the relevant criteria of the policy.
Policy 28 Carbon reduction, community energy networks, sustainable design and construction, and water use	The proposed development includes for a design that targets: • All office buildings will be high performing, achieving a minimum BREEAM score of 85% which is 'Outstanding'. • The remaining buildings (excluding the MSCP element of Building 10) will all achieve a minimum BREEAM certification of 'Excellent', with a push target to achieve Outstanding. • The development will be fully electric and renewable technologies will be included from the outset. • A target is included for embodied carbon to be less than 600kgCO₂e/m² for office buildings and 750 kg CO₂e/m² for labs to ensure betterment of the LETI 2020 Design Target. • All five WAT 01 credits will be targeted, plus the additional exemplary credit through incorporating rainwater harvesting. • In line with Part L 2021, the development will achieve a reduction in carbon emissions compared with an notional building, under Ene 01 targeting 6 for office buildings and 4 credits for laboratories. • Significant enhancements for biodiversity compared with the existing site, including a significant 100%+ improvement in BNG. • NABERS score of 5.
Policy 29 Renewable and low carbon energy generation	

	Wiredscore platinum enabled.
Policy 31 Integrated water management and the water cycle	Water efficiencies and water reuse are designed into the development to reduce demand for potable water.
Policy 32 Flood risk	The Site is in Flood Zone 1 and the increased coverage of the site with soft landscaping, green and blue roofs and the integration of SuDS features will provide a benefit to off site areas by reducing flood risk.
Policy 33 Contaminated land	A detailed Ground Investigation Report has been submitted within the ES and a CEMP will include appropriate mitigation measures during construction phases, minimising any potential impacts.
Policy 34 Light pollution control	The strategy promotes the adoption of sustainable and environmentally friendly lighting solutions to manage energy usage, reduce carbon footprint and minimize light pollution.
Policy 35 Protection of human health and quality of life from noise and vibration	Noise and vibration have been assessed within the ES. Future users of the development will be protected from noise and vibration ingress via such methods as building façade treatment and acoustically rated double glazing.
Policy 36 Air quality, odour and dust	The Proposed Development would have a minor beneficial impact on local air quality, a technical report has been submitted as part of the ES to demonstrate that there would be negligible residual effects from dust and noise.
Policy 37 Cambridge Airport Public Safety Zone and Air Safeguarding Zones	There will be no impact on the safety of Cambridge Airport.
Policy 40 Development and expansion of business space	Dealt with in main evidence.
Policy 41 Protection of business space	The proposed development provides a significant increase in business space in accordance with Cambridge objective needs and market requirements.
Policy 42 Connecting new developments to digital infrastructure	The development is proposed to achieve Wiredscore Platinum enabled and has outstanding communication connectivity.
Policy 55 Responding to context	The proposals comply with the policy, the DAS and the DAS Addendum outline how the scheme has responded to context.
Policy 56 Creating successful places	As set out within the DAS and DAS Addendum, the development will create spaces and places suitable for all.
Policy 57 designing new buildings	The development proposes a strategy to deliver exceptional new buildings from an award-winning international practice. This is set out within the DAS and DAS Addendum. These matters are also discussed within the Masterplanning Proof of Evidence prepared by David Leonard.
Policy 59 Designing landscape and the public realm	The masterplan for the site is a highly responsive form, which includes significant areas of open space and public realm, as set out within the DAS and DAS Addendum and Landscape and Open Space Parameter Plan.
Policy 60 Tall buildings and the skyline in Cambridge	Dealt with in main evidence.
Policy 61 Conservation and enhancement of Cambridge's historic environment	Dealt with in main evidence.
Policy 62 Local heritage assets	
Policy 67 protection of open spaces	Dealt with in main evidence.

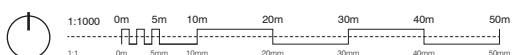
Policy 68 Open space and recreation provision through new development	There is significant uplift in high quality public realm.
Policy 69 Protection of sites of biodiversity and geodiversity importance	There are no impacts on priority species or habitats, however there is a significant Biodiversity Net Gain proposed.
Policy 70 Protection of priority species and habitats	
Policy 71 Trees	Dealt with in Consultee Comments in my Appendix 1.
Policy 73 Community, sports and leisure facilities	As set out in the Statement of Common Ground at paragraph 7.26, there is a partial conflict with Policy 73 amounting to negligible harm, resulting from the loss of an existing leisure facility on the site and the absence of a like-for-like replacement. The LPA has formed a mitigation scheme in the form of an off-site leisure contribution to resolve the policy conflict to be secured through the S.106 agreement.
Policy 80 Supporting sustainable access to development	Dealt with in main evidence.
Policy 81 Mitigating the transport impact of development	Dealt with in main evidence.
Policy 82 Parking management	A Car Parking Management Plan supports the application and sets out the terms of on and off-site parking provision measures in support of the travel plan measures to achieve the targeted modal shift.
Policy 84 Telecommunications	The development will be Wirescore Platinum enabled.
Policy 85 Infrastructure, delivery, planning obligations and the Community Infrastructure Levy	Necessary infrastructure is to be provided as part of the development or secured through planning condition or s106 agreement.

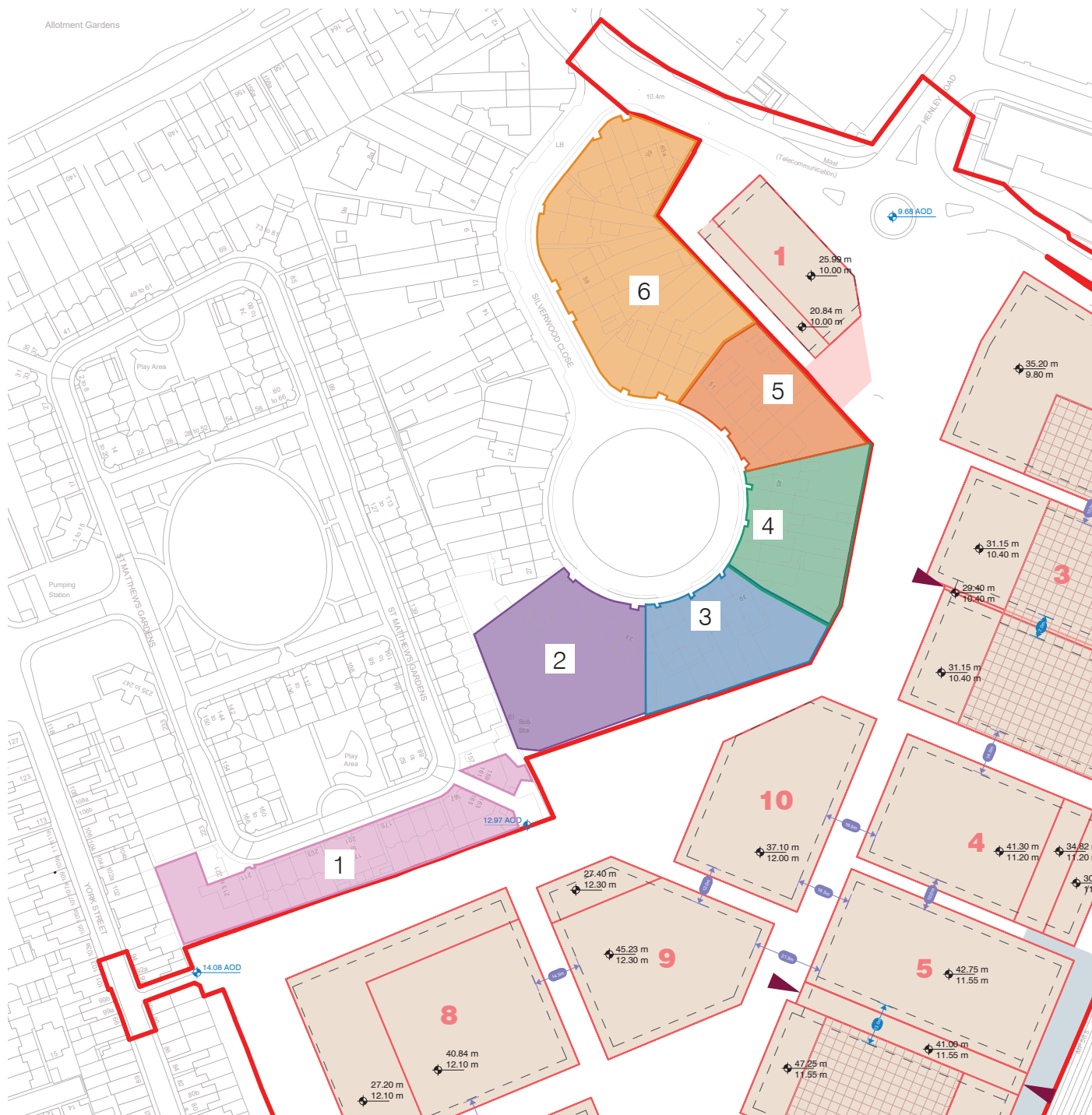
APPENDIX 4

RESIDENTIAL OUTLOOK GROUPS

1:1000 at A4

-  Group 1 – Facing Properties at St Matthew’s Gardens.
-  Group 2 – Facing Silverwood Close terrace row with their rear elevation facing south west.
-  Group 3 - Facing Silverwood Close terrace row with their rear elevation facing south east.
-  Group 4 - Facing Silverwood Close terrace row with their rear elevation facing east.
-  Group 5 - Facing Silverwood Close terrace row with their rear elevation facing north east.
-  Group 6 – Facing Silverwood Close terrace rows that bend around the western corner of Building 1.

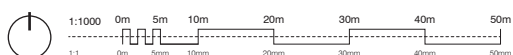


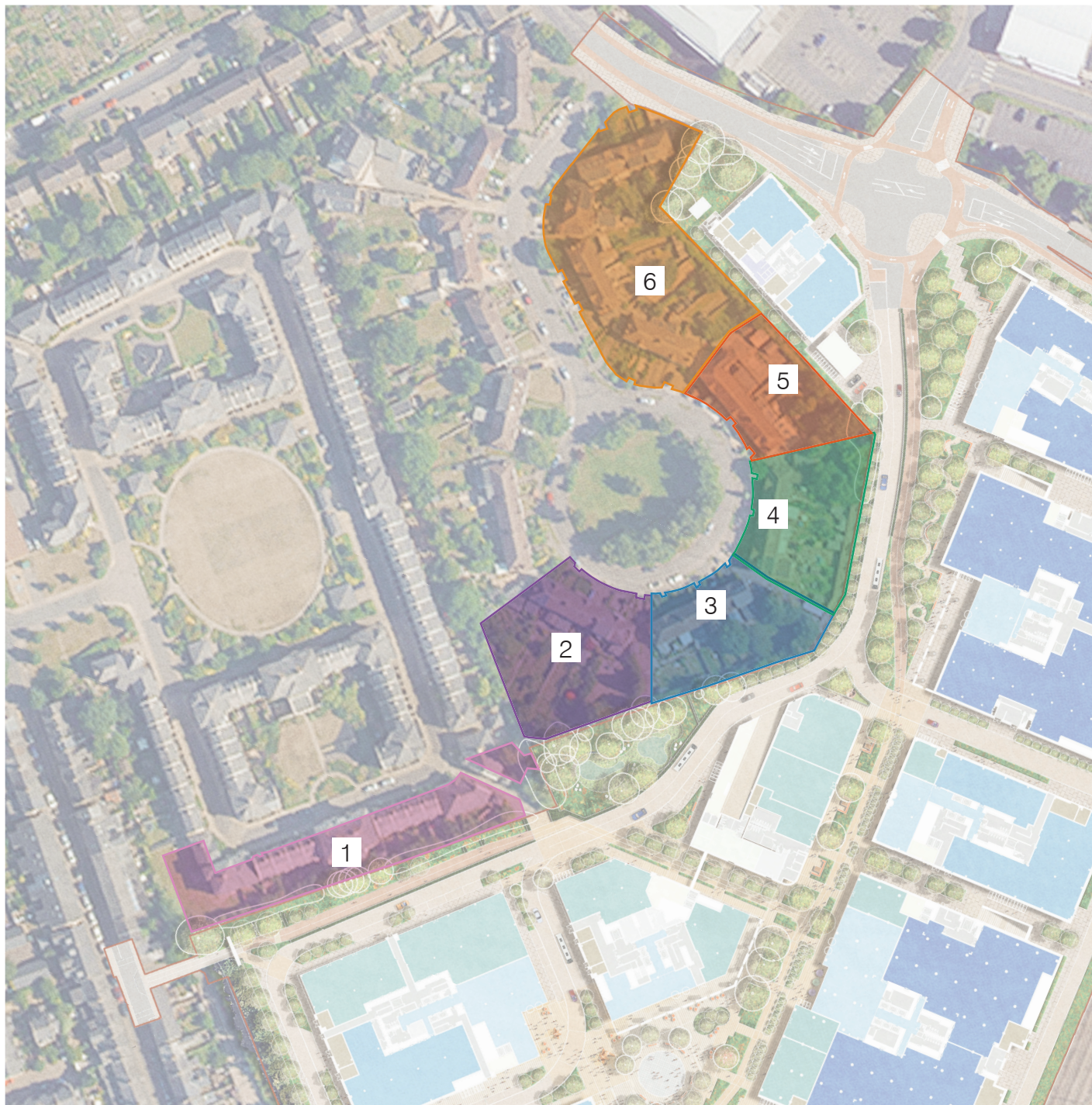


Overlay with Maximum Building Heights and Plots Parameter Plan

1:1000 at A4

- Group 1 – Facing Properties at St Matthew's Gardens.
- Group 2 – Facing Silverwood Close terrace row with their rear elevation facing south west.
- Group 3 - Facing Silverwood Close terrace row with their rear elevation facing south east.
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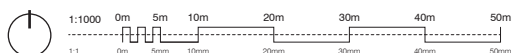




Overlay with Illustrative Masterplan

1:1000 at A4

- Group 1 – Facing Properties at St Matthew's Gardens.
- Group 2 – Facing Silverwood Close terrace row with their rear elevation facing south west.
- Group 3 - Facing Silverwood Close terrace row with their rear elevation facing south east.
- Group 4 - Facing Silverwood Close terrace row with their rear elevation facing east.
- Group 5 - Facing Silverwood Close terrace row with their rear elevation facing north east.
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APPENDIX 5

APPLICANT RESPONSE TO THIRD PARTY REPRESENTATIONS

APPLICANT RESPONSE TO THIRD PARTY REPRESENTATIONS

Applicant Response to Third Party Representations not addressed as part of the inquiry evidence base

Introduction

This appendix provides a reply to third party representations made to the inquiry ref: APP/Q0505/V/25/3360616 that are not otherwise dealt with as part of the main evidence. The representations have been reviewed and categorised into topic areas.

Topics raised by third-party representations that are addressed through the inquiry evidence base and are not considered within this appendix include:

- Townscape and Visual Impacts
- Heritage Impacts
- Residential Amenity
- Socio-economic Impacts (Need)
- Planning Balance

Transport and Highway Safety

Third parties have raised concerns regarding transport impacts and highway safety. The representations raise concerns over the local road network's ability to accommodate the anticipated trip generation in a safe and suitable manner, especially during peak times.

The Transport Assessment (CD2.47) considered two trip generation scenarios as agreed with Cambridgeshire County Council (CCC), as the local highway authority. These would consider arrival, departure and two-way trip totals for the peak hours and daily volumes, based on the target mode shares for each adopted travel mode. As summarised in the planning statement (CD2.03b, para 9.135);

'The Site currently attracts a high proportion of car/van vehicular trips with a total of 11,215 two-way movements in an average 24-hour period. As a retail park, the majority of trips are for short periods of shopping, with regular vehicle turnover. By comparison, the majority of end-users of the Proposed Development will typically be staying for longer periods, reflecting the working patterns of employees. The comparable 24-hour trip generation figures for the Proposed Development is 529 two-way movements based on the proposed modal shift pattern. This decrease in daily vehicular trips to and from the Site, will reduce pressure on the surrounding highway and improve the wider amenity of the area, including reduced noise and air pollution.'

Through consultee responses to the planning applications and as summarised in the planning committee report, the County Council had no objection on highways grounds, subject to the proposed mitigation set out by the Applicant.

As set out in section 25.68 of the planning committee report (CD3.01);

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

Furthermore, section 25.69 and 25.70 of the planning committee report states;

'Its [the Applicant's sustainable transport strategy] proposed mitigations are also considered comprehensive and critical to achieving its core transport and sustainability objectives which in turn would support its overarching vision to create a well-connected and innovative new urban quarter in the City.

Both the LHA [Local Highway Authority] and ATE [Active Travel England] have confirmed they do not object to the proposals on transport grounds subject to relevant conditions and obligations.'

Planning officers came to the conclusion in section 25.71 of the committee report that;

'notwithstanding the formal recommendation to refuse the application, in the event that planning permission is otherwise granted or the scheme appealed, officers would recommend that the transport related planning conditions as referenced, alongside the Section 106 obligations'.

The suite of planning conditions and planning obligations supporting the Inquiry process capture the proposed transport mitigation measures including for the enhanced access points and the improvement of local pedestrian and cycle infrastructure to support the modal shift towards a much greater use of sustainable transport modes. In addition, they provide for a bus enhancement plan to secure a significant increase in public bus provision for the Site and the locality more generally.

The Application has addressed transport and highway capacity and safety. Neither the Council nor statutory consultees have any objection to the proposed development on these grounds.

Water Resources – Water Supply

Third parties have raised concerns regarding water resources and the availability of water to serve the Development.

The submitted Environmental Statement (CD1.05h, para 15.18) concludes;

'Potential impacts upon local water resources and water supply networks impacts are mitigated by promoting water efficiency and rainwater reuse to drive down potable water demand with residual impacts considered to be negligible'.

The Environmental Statement Addendum: Non-Technical Summary (CD2.51 para 7.14) confirms;

'Potential impacts upon drinking water supply would be mitigated by building in water efficiency and rainwater reuse within the Proposed Development to drive down demand for drinking water. Cambridge Water has also confirmed that existing local water mains have capacity to serve the entire Proposed Development.'

An assessment of these issues raised by the third party representations are also clearly set out in the planning committee report. As demonstrated in section 8.35 of the planning committee report, the Environment Agency have no objection to the proposed development. Furthermore, the planning authority considered this matter in section 21.32 of the planning committee report and concludes there is no reasonable basis to refuse the application on grounds of water impact.

Section 21.40 and 21.41 of the planning committee report (CD3.01) concludes;

'officers are satisfied that the Applicant's strategy to address future water usage/demand in its own proposals (at project level) meets and exceeds the current adopted planning policy requirement in the CLP (2018). This is welcomed by officers.'

Therefore, based on the above, it is considered that CLP Policies 28, 31 and 70, the Greater Cambridge Sustainable Design and Construction SPD 2020, the NPPF, PPG and Water Framework Directive (England and Wales) Regulations 2017 have been complied with.'

The Applicant has addressed water resources during the planning application process. Neither the Council nor statutory consultees have any objection to the proposed development on these grounds.

Drainage and Flood Risk Management - Foul Water

Third parties have raised concerns regarding drainage and flood risk management, particularly around the ability of the proposed development or nearby infrastructure to deal with foul water. The representations focus on whether the proposed development can be accommodated within the existing foul drainage network.

The Application includes a comprehensive Drainage Strategy (CD2.53) and the current agreed planning conditions with the Planning Authority (appended to the 28 March 2025 Statement of Common Ground) include a requirement for the submission and approval of detailed drainage plans to support the detailed design and delivery stage of the proposals.

As set out in the Environmental Statement (CD1.05, para 8.169-8.171);

'Upon the grant of a planning consent, Anglian Water would also have an obligation, under the terms of the regulator Ofwat, to provide sufficient resilience within the sewerage network to accommodate the Proposed Development without detriment to the water environment, in particular the water quality of the receiving water body downstream of the relevant wastewater treatment facility, namely Milton WRC.'

Sewer connection application(s), informed by impact studies where appropriate, will be submitted to and approved by Anglian Water prior to construction. Local and strategic reinforcements and upgrades to the public foul sewer network would ensure that hydraulic capacity and flood resilience are maintained within the system.'

Following implementation of these measures, the anticipated residual effect on foul water infrastructure capacity over the anticipated operational lifetime of the Proposed Development would likely be a permanent (long term), local neutral effect of negligible significance.'

As set out in section 8.2 of the planning committee report, Anglia Water have no objection to the proposed development. Anglian Water;

'acknowledges that it is obligated to, in the event of planning permission being granted, accept foul flows from approved developments and would therefore, in the event of planning permission being granted, take the necessary steps to ensure there is sufficient treatment capacity at the Cambridge WRC.'

Section 20.9 of the planning committee report comes to the conclusion that;

'the proposed development is capable of support in respect of foul water and flood risk impacts through the imposition of conditions. No conflict arises with policies 31 and 32 of the CLP or the relevant objectives contained within the NPPF.'

The Application has addressed drainage and flood risk management. Neither the Council nor statutory consultees have any objection to the proposed development on these grounds.

Principle of Development - Loss of Retail

Third parties have raised concerns regarding the principle of development and specifically the loss of retail and local amenities.

There are no planning policies acting against the principle of the development. Section 1.6 of the planning committee report states;

'In terms of the principle of development, the site is not allocated within the adopted Cambridge Local Plan (CLP) (2018), however, it is located within the urban area of Cambridge where the spatial strategy embedded into Policy 2 of the CLP focusses new employment development, alongside site allocations, Areas of Major Change, Opportunity Areas, and the City centre.'

The retail uses on the Site are not protected by planning policy and Section 1.9 of the planning committee report highlights that;

'The redevelopment of the site would subsequently result in the loss of the existing occupiers from the site. Whilst there is concern within the community about the loss of the existing occupiers, the planning system is concerned with operational development and changes of use, it cannot protect individual occupiers. The loss of the existing occupiers would be beyond the scope of the Council's planning function to intervene.'

There is no planning policy that acts to retain the existing retail space, the named retailers or secure their relocation. The planning evidence describes that Railpen also purchased the adjoining Cambridge Retail Park and, for commercial reasons, is making concerted effort to facilitate the relocation of many current Beehive retailers to the Cambridge Retail Park.

Neither the Council nor statutory consultees have any objection to the proposed development on these grounds.

Principle of Development - Loss of Leisure Facility

Third parties have raised concerns regarding the principle of development related to the loss of existing leisure facilities.

The proposed development would result in the loss of an existing paid-membership leisure facility, which relates to Policy 73 of the adopted Local Plan.

The Statement of Common Ground (CD6.03, paragraph 7.26) addresses this point:

The parties are agreed that there is a partial conflict with Policy 73 amounting to negligible harm, resulting from the loss of an existing leisure facility on the site and the absence of a like-for-like replacement. The LPA has formed a mitigation scheme in the form of an off-site leisure contribution to resolve the policy conflict to be secured through the S.106 agreement, as detailed in the Outline Heads of Terms (Appendix 2).

To substantiate the assessment to find only a 'negligible harm', prior to mitigation, the Planning Statement (CD2.03, Paragraph 9.129) explains:

- *The proposal includes for adaptable community floorspace that will allow for active uses, such as pilates, dance classes and other forms of exercise classes, albeit to a smaller floor area than that within the existing gym at the Beehive Centre*
- *The proposal includes for new and extensive free-to-use external space to facilitate outdoor activities and more generally support improved health and wellbeing*
- *The gym is a private membership facility and under a limited-period lease agreement to occupy Unit 2b*
- *A Gym (The Gym Group) has been provided at the southern end of Cambridge Retail Park (to*

the opposite side of Coldham's Lane from the Beehive Centre) that has increased the gym provision locally to a comparable accessibility to Unit 2b

- *There are other gyms in the locality notably Nuffield Health (to the immediate north east of the Beehive Centre to Coldham's Lane); Kelsey Kerridge Sport Centre and Parkside Pools and Gym (a five minute cycle to the south west at Parker's Piece); and PureGym at the Grafton Centre (a five minute cycle west).*

Following mitigation, the Council has no objection to the development arising from the loss of the leisure facility.