

**Better Beehive Group Cambridge**  
**Objection to Beehive Centre Redevelopment – planning application ref.**  
**23/03204/OUT (September 2024 revision)**

**BBCG object to the proposals within the revised Beehive planning application. We support the redevelopment of the Beehive site in principle and would advocate for a further reduction in number of buildings, height and mass in favour of a mixed-use development to include retail and residential use.**

## **1. Introduction**

- 1.1. The Better Beehive Cambridge Group submitted an objection to the Beehive application in December 2023. We do not consider the revised submission of September 2024 goes far enough to overcome our objection.
- 1.2. Our residents' group recognise and note the most recent design changes as described in the recent revised submission. We also recognise the efforts that have been made over the last few months by all concerned to try and bring this proposal to an acceptable level.
- 1.3. We remain convinced that the Beehive application should not gain planning approval. The headlines of our areas of concern are as follows:
- 1.4. **Need** - This is a speculative planning application for yet more high tech and research laboratory space. By GCSP's own evidence (Iceni Projects, 2024), this type of development is currently not needed. Far better therefore, that further developments of this type are part of a plan-led approach as opposed to permitting more speculative developments in inappropriate locations.
- 1.5. **Scale and Massing** - The revised building blocks remain extremely substantial and, on the whole, have larger footprints than previously. We are particularly mindful of the overwhelming effect of the combination of building height + mass + number + unremitting boxy form + closeness to each other has on the surrounding suburban area and on the city skyline.
- 1.6. **Climate** - We note the efforts that have been taken to improve the greening of the site and the possible implementation of the (untested) Water Credits Scheme as well as the inclusion of water saving devices. Nevertheless, we strongly believe that a development of this scale on the Beehive site would certainly not have a neutral or beneficial effect on climate change. We remain particularly concerned about the Urban Heat Island Effect and the additional burden on our region's water resources.

- 1.7. **Heritage** - The scale of development proposed is far too substantial for the surrounding area to accommodate comfortably. It would result in unacceptable harm to the City's historic skyline, as well as harm to the Mill Road Conservation Area, urban/suburban character and to a significant amount of neighbouring housing.
- 1.8. **Connectivity** - The site is very poorly served by public transport as well as poor cycling and walking connections. These poor connections might possibly be improved by the measures mentioned in the Travel Plan, but they cannot fundamentally overcome the accessibility problems of the area in the longer term without the major intervention/funding of city-wide infrastructure improvements. Furthermore, we believe the development would cause more congestion in the area since the traffic generated by retail would not disappear if the retail units are relocated to the Cambridge Retail Park.
- 1.9. **Precedent** – The Beehive application follows close on the heels of the Grafton Centre permission, but in terms of scale and massing the Beehive is the larger of the two. Both developments would set up precedents for tall and bulky buildings in urban/suburban areas of the City. The Beehive however would set up a precedent for 1) tall bulky buildings in the Coldham's Lane vicinity, and 2) for large clusters of large bulky, flat roofed buildings in direct competition with heritage assets in views of the city panorama.
- 1.10. **Sustainability** - We believe the proposals breach the fundamental premise of sustainable development within the National Planning Policy Framework and Cambridge Local Plan (2018). We also believe that the Beehive application breaches Local Plan Policies 1, 5, 8, 28, 36, 55, 56, 60, 61, 67 and 81.

## **2. Appropriateness and Need for laboratory space at the Beehive Centre**

- 2.1. **Appropriateness** - The Beehive site has not been identified in the current or emerging Local Plan as a potential site for office, ICT or laboratory use. The proposals would establish a speculative, high-density employment site in a suburban and Conservation Area setting, isolated from any other research facility and with poor transport links.
- 2.2. This type and scale of development is appropriate at a location such as CB1 which is a major commercial area, travel hub, gateway to the city etc. and has similar scale buildings around it, but the Beehive Centre does not have any of those features.

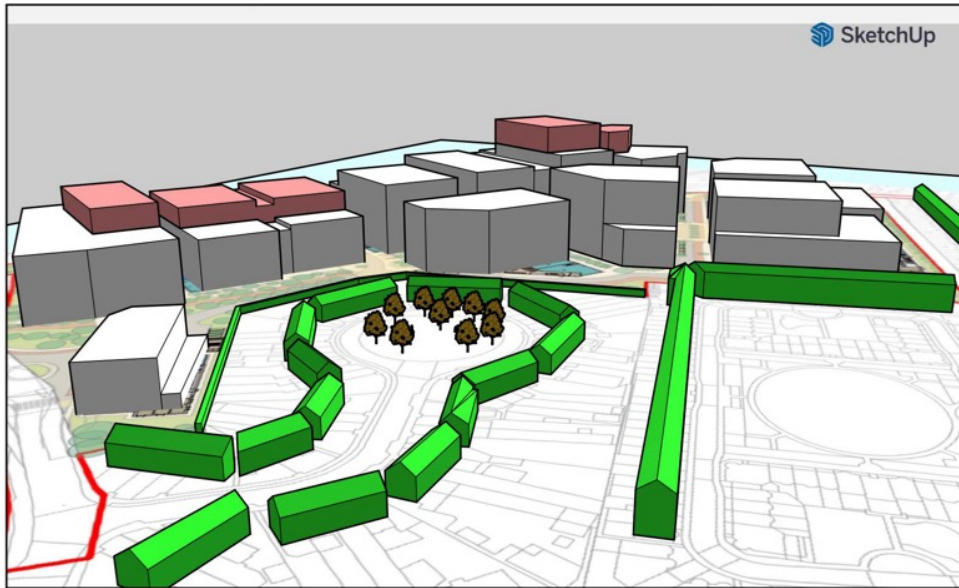
- 2.3. **Need** - We challenge the need for further laboratory space within Cambridge. There has recently been a huge increase in planning applications and permissions for large and smaller speculative R&D laboratories and offices. Among those larger permissions are the Grafton Centre, Westbrook Centre and Coldham's Lakes.
- 2.4. Greater Cambridge Shared Planning has recently commissioned a report from Icen Projects on the amount of lab and office space currently in place and with planning permission. The report also covers the requirement for more lab and office space in the Cambridge area. It states that:
- "The supply for life science laboratory space for testing of drugs, chemicals or biological matter (known as "wet labs") from 2025 to 2030 is now substantial and sufficient to meet the expected needs" adding that beyond 2030 there may be need for more. The report also reveals that, "there may remain a shortfall in the critical smaller space for life science "start-up" businesses" and that "future supply for general office space, and for laboratory space involving dry materials or computer analysis (known as "dry labs"), ... appears relatively healthy looking ahead, however there are likely to be additional requirements later in the 2030s which the emerging joint Local Plan, ... will need to plan for."*
- 2.5. Interestingly the report also adds, *"Prioritising 'place based' business destinations for life science and ICT that offer high quality, modern, best-in-class workspaces that: preferably form part of a larger cluster to enable knowledge exchange"*. The Beehive site is not near any larger lab cluster such as the Cambridge Biomedical Centre or the Babraham Research Campus.
- 2.6. In summary, the evidence says that the huge spaces that would be created at the Beehive site are not needed at the current time, but some smaller spaces maybe needed now and larger spaces post 2030. Furthermore, high tech and labs should be clustered together for collaborative working. Even given a lengthy lead in and build-out time for building plots at the Beehive site, we believe the developer might be considerably over-egging the pudding with this application.
- 2.7. The Beehive proposals would create more jobs, which might be good for the local economy, but jobs without housing would exacerbate the pressures we already have on housing numbers, as well as community infrastructure and facilities such as transport, GP and dentist appointments, hospital beds, school places, water, energy etc. etc.

### **3. Revised Scale and Massing (including overlooking and overshadowing)**

**In contravention of Policies 8 : Setting of the City; 55 : Responding to Context, 56 : Creating Successful Places, and 60 : Tall Buildings and the Skyline in Cambridge**

- 3.1. There are positives and negatives to the recent changes in design; the revisions primarily include the lessening of the number of buildings from 12 to 10, five buildings reduced in height by between 0.9m and 5.5m and the green spaces consolidated. We note however that there has been an increase in height of one building and an increase of the floorplate of some buildings to enable loss of floor space to be regained. We particularly take notice of the 21.5m high (equivalent to 8.36 residential storeys) multistorey car park that has been moved from adjacent to the railway to a location immediately adjacent to Silverwood Close housing.
- 3.2. The BBCG recently requested a Residential Visual Amenity Assessment; the request was denied on the grounds that there would be CGIs in the Design and Access Statement giving an idea of what the proposals would look like from various rear gardens. The greyed-out CGI 'illustrative' views in the DAS (pg.104-149) do little to convince that the proposals are acceptable. The images below were generated by BBCG to give a fuller 3D idea of the overwhelming height and bulk of the revised proposals in context of the surrounding streets.
- 3.3. The dimensions, locations and other details of the buildings shown in the Sketchup software generated images below have been taken from the revised Maximum Building Heights & Plots Parameter Plan of September 2024. The parameter plan shows building heights including rooftop plant and PV zone, but not including extractions flues (which can be up to 25% of the host building height). The solid pink areas atop the blocks in the images indicate the rooftop area in which the flue(s) would be located somewhere.

## Aerial view of original re-submission 2024



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Images are for demonstration purposes only and are an artist's visualisation

Figure 1: View from northwest - Sketchup image illustrating the proposed height and volume of the revised Beehive buildings in comparison to the 2/3 storey buildings of Silverwood Close and St. Matthew's Gardens in green.

## Beehive re-submission 2024 - Shadows @ 12.00hrs 24th September



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Figure 2 : View from southwest - Sketchup image illustrating the proposed height, volume and shadow of the revised Beehive buildings in comparison to the 2/3 storey buildings of Silverwood Close, York Street and St. Matthew's Gardens in green.

- 3.4. The revised proposals give the heights of each building (not including the flues) as follows: Revised Scheme Plot Storeys and Max Heights:
- Plot 1: 3 commercial storeys, 15.9m (equivalent of 5 residential storeys)
  - Plot 2: 5 commercial storeys, 25.4m (equivalent of 8.5 residential storeys)
  - Plot 3: 4 commercial storeys, 20.7m (equivalent of 7 residential storeys)
  - Plot 4: 6 commercial storeys, 30.1m (equivalent of 10 residential storeys)
  - Plot 5: 7 commercial storeys, 35.7m (equivalent of 12 residential storeys)
  - Plot 6: 6 commercial storeys, 31.0m (equivalent of 10.35 residential storeys)
  - Plot 7: 6 commercial storeys, 28.7m (equivalent of 10 residential storeys)
  - Plot 8: 6 commercial storeys, 28.7m (equivalent of 9.5 residential storeys)
  - Plot 9: 7 commercial storeys, 32.9m (equivalent of 11 residential storeys)
  - Plot 10: 8 commercial storeys, 25.1m (equivalent of 8.36 residential storeys)
- 3.5. A small point of interest - the ground level of the site increases towards the York Street boundary. This makes a surprising amount of difference in the views of the building cluster from a distance, particularly Blocks 5 and 6 which are not only the tallest buildings on the site, but are located at one of the highest points of the site. This of course adds to their harmful visual effect and counters the argument that the tallest buildings are in a central location so lessening their impact on neighbours. Also to add that Block 6 is extraordinarily close to Sleaford Street properties.

## 4. Revised Townscape and Visual Impact Assessment

- 4.1. The evidence relating to the effect the proposed buildings would have on the surrounding area and the city skyline is taken from the revised Townscape and Visual Impact Assessment and its updated technical visualisations. We see that out the 18 verified viewpoints in the TVIA and visualisations, 10 have an adverse impact to some degree.
- 4.2. **Cumulative views** – Following the permission of the Grafton application for lab space (23/02685/FUL), we have given particular consideration to the cumulative views in relation to the revised proposals. The cumulative views show the Beehive proposals together with other similar speculative, large-scale, high-density developments such as the Grafton Centre and the Westbrook Centre. These views reveal the truly significant harm to the city skyline that these clusters of large-scale buildings will create. See comments below.
- 4.3. Policy 60 states "*Any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form will be considered against...*" It then gives a list of criteria. The revised proposals do not take due



regard of the criteria as follows:

- a) **location, setting and context** - the existing domestic buildings around the Beehive site are mainly 2-3 storeys (circa 10m high); many in the Conservation Area. The highest buildings in the area are the two x 7 residential storey plots at Timber Works to the east of the railway which are each around 21m high. The proposed cluster of very tall, large floorplate buildings, up to 44.62m (including flues) certainly would not harmonise with their setting and context.
- b) **impact on historic environment** – The proposals continue to be of a very different scale, mass and form to their surroundings and therefore wholly disregard the setting of Mill Road Conservation Area. Neither do they take due regard of the historic collegiate core of the city shown in long distant views.
- c) **scale, massing and architectural quality** - the scale and massing are entirely out of proportion to the surrounding buildings. The architectural detailing that might be incorporated into the facades could not hope to complement anything in the locality. Furthermore, the architectural quality incorporated into the boxy form would only be appreciated when viewed relatively close up to the buildings. From a distance, any detail in the facades would be lost and the development would simply read as one large mass.
- d) **amenity and microclimate** – obvious consequences of such large buildings tightly packed into an area is that there would be some degree of wind funnelling, overlooking and overshadowing. These issues would persist despite architectural detailing of the fenestration as claimed.

The likely effects of wind funnelling through these tall buildings is recognised in the supporting documents. Mitigation puts a reliance on planting to filter wind volumes. However, it is doubtful that the planting can establish well and thrive because of the shade given by the buildings. If planting cannot thrive, it cannot have a mitigating role.

- e) **public realm** – The spaces between the buildings continue to be too narrow/small. The resulting lack of openness may well promote an oppressive dominance of the large-scale buildings.

The lack of space between buildings would also result in a scarcity of meaningful gaps and views through the development resulting in the development merging into one large mass in longer distant views.

- 4.4. **Updated Technical Visualisations** - As previously stated, 10 out of the 18 visualisations are categorised as harmful. We have picked out five of the most harmful as follows:
- 4.5. The view from Castle Mound (AVR01) of the revised scheme reveals that Plot 5 and its flues still breaks the skyline and the extent of the whole development, i.e. the amount of space the development takes up in the panorama, would be substantial. Furthermore, looking at the cumulative view, the Beehive together with the Grafton permitted scheme, would clearly dominate any views of historic assets.
- 4.6. When looking at the view from Red Meadow Hill (AVR10) the revised view manages to keep the majority of the Beehive plots below the skyline, but not the highest part and flues on Plot 5. What is instantly striking however is just how close the Grafton Centre (outlined in yellow) and the Beehive are to historic assets; both are immediately adjacent to King's College Chapel. Furthermore, the newly permitted Westbrook Centre (outlined in pink/purple) is precisely lined up behind the chapel and possibly interrupting/confusing the view of its distinctive turrets. Other heritage assets are captured in the view, but the dominating extent of the new developments would render them entirely inconsequential.
- 4.7. From Wort's Causeway (AVR11) the maximum cumulative view shows that the mass of the Beehive development would be considerable just under the skyline. The view is also a good example of how much of the panorama would change to one of extensive areas of continuous flat-roofed buildings drawing the focus away from the current impression of variety and richness.
- 4.8. The view of the Beehive development from Coldham's Common (Green Belt) north (AVR02) remains unacceptably imposing above the cluster of domestic dwellings on Cromwell Road and Coldham's Lane. We know there is a view of the flatted blocks on Cromwell Road from the far side of Coldham's Common, it is obvious that the Beehive development would have an unacceptably strong presence from that part of the Green Belt.
- 4.9. Coldham's Common South (AVR03) remains unacceptably imposing on the open space, replacing the current view which barely contains any buildings at all. The solar panels and flues have a particular incongruous presence.
- 4.10. **Nearby views** - We strongly challenge the benefits claimed in the architectural sections shown in the DAS pg.83-87. The sections are provided *"to allow clear communication of the expected scale of space and sense of containment that the*



*new buildings will create and how this is comparable to existing conditions within the city”.*

- 4.11. We challenge the idea that the relationships that would be set up between the existing housing and the cluster of huge Beehive buildings is comparable to any other examples in the area. In fact, we do not believe that such a striking contrast between a large cluster of very large buildings and so many small domestic dwellings has ever been built in the city before.
- 4.12. The sections show the relationships between the surrounding housing and various adjacent Beehive buildings. We see that the relationships are improved through a lessening of height and stepping back of buildings, but fundamentally the views from the surrounding dwellings are of extremely large buildings very close to small domestic homes. The views would be dramatically changed from that of sky and existing retail unit roofs to an entirely different scale and form of building. Indeed, the striking contrast in scale is obvious in the sections.
- 4.13. The DAS goes on to give some illustrations of local new developments in the immediate area that it claims to be “*similar neighbouring conditions of a change in scale from existing terraced housing*”. The examples are Anglia Ruskin Science Centre (Broad Street), Anglia Ruskin Young Street Building and St Matthews Gardens. The examples are plainly not similar; the scale of the new buildings mentioned is much smaller and the number of surrounding dwellings far fewer.
- a) In the architectural sections of the Broad Street Science Centre application, we agree that the science building is larger than the domestic buildings opposite, but it is certainly not of the scale of any of the proposed Beehive buildings. It also scales back very quickly through steps and slopes; it is a poor comparison to any of the larger, sheer sided Beehive buildings.
  - b) The award-winning Anglia Ruskin building between Young Street and New Street is six storeys at its highest and considerably smaller in footprint. The highest part of the building is at the junction with St. Matthew’s Street. The building quickly steps down to a green roof terrace and then to a small ground level landscaped area where then, and only then, does it interact with the 2 storey Victorian terrace opposite. In its design, the ARU building is a good neighbour and clearly does not compare with the Beehive proposals.
  - c) Regarding the relationship with the adjacent St. Matthews Gardens dwellings, there are sections within the DAS that clearly show that the highest part of Plot 8 which is substantially higher and remains very close to SMG and York Street.

## 5. Heritage and Conservation

**In contravention of Policies 8 : Setting of the City, 60 : Tall Buildings and the Skyline in Cambridge, and 61 : Conservation and enhancement of Cambridge's historic environment together with Appendix F, and the NPPF paras 199-206**

- 5.1. The Beehive site is immediately adjacent to the Mill Road Conservation Area and although the site does not include or contribute to any heritage assets, the height, and mass of the proposed development would have a harmful impact on the setting of heritage assets. This is clearly seen in the revised TVIA and verified views July 2024.
- 5.2. The revised proposed buildings remain extremely substantial with several larger in footprint than before. In particular, Plot 5 which has an area 6310m<sup>2</sup> and rises to 44.62m in height including the extraction flues. Plot 6 rises to 38.81m including flues and is immediately adjacent to Sleaford Street properties. That's the equivalent of 11.9 and 10.35 residential storeys respectively. To offer some comparison in heights of heritage assets; the University Library tower is 49m; St John's Chapel Tower 50m; and King's College Chapel 29m.
- 5.3. Not only are these buildings significantly taller than the predominately 2/3 storey neighbouring buildings of the Conservation Area, they are very deep and wide, each forming a bulky mass that when viewed either individually, or cumulatively as a cluster, would have a significant harmful impact on the character of the area.
- 5.4. Our position on the impact on the setting of the city and its skyline/panorama has not changed. The existing panorama of the city is of a rich and interesting roofscape with its differing yet harmonising colours, textures and forms. The panorama similarly includes intriguing, old and modern architectural events and all punctuated by trees, collegiate towers and spires. The popular elevated viewpoints around the city that are specifically documented in Appendix F and Policy 60 show this rich panorama. As mentioned in 4 above, if the Beehive proposals are permitted, in addition to the Grafton Centre permission, we would see a city skyline/panorama overwhelmed by vast areas of unmitigated flat roofed buildings and extraction flues.

## 6. Local urban context

**In contravention of Policy 55 : Responding to Context, and Policy 56: Creating successful places**

- 6.1. The proposals wholly disregard the domestic scale of the surrounding buildings to the south, east and west. It is abundantly clear that the over-sized proposals do not respond positively to their suburban context.

- 6.2. We believe that maximising floor space remains a top priority in this application, as can be seen in the overcrowded arrangement of the buildings. The amount of public realm and green space does very little to mitigate the proportions of the buildings. All in all, the proposals have little regard for place making, or the promotion of human scale or comfort and are in no way sympathetic to the surrounding areas of the Abbey, Petersfield and Romsey Wards.
- 6.3. The pulling back of Plots 7 and 8 from the boundary with the Conservation Area is welcome, but the ultimate size of the buildings cannot be ignored or disguised. The development would present a sudden and spectacular change in height, mass, form and use.

## **7. Climate Change, Sustainability and Energy Efficiency**

**In contravention of Section 4 of the Local Plan as well as Policy 28 - Responding to Climate Change and Managing Resources. Also, in contravention of the City Council's declared Climate Emergency.**

- 7.1. Cambridge city and the surrounding area has seen an astonishing amount of growth in the last two decades. That fast and extensive growth has resulted in an overwhelming sense of concern when it comes to environmental issues.
- 7.2. Certain aspects of the environment are under particular strain including water, air quality and overheating.

### **Water scarcity**

**In contravention of Paragraph 5 of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Section 4 of the Local Plan as well as Policy 28 - Responding to Climate Change and Managing Resources, and The 2020 Sustainable Design and Construction SPD and is in contravention of The City Council's declared Climate Emergency.**

- 7.3. We know that generally, the Cambridge region suffers from depleted ground water through drought and over abstraction for drinking water, industrial use and agricultural irrigation.
- 7.4. Drought conditions and over abstraction has put enormous pressure on our water courses. At times over abstraction, combined with no rain, has resulted in low water and oxygen levels in our water courses causing incidents such as that in June 2023 when hundreds of fish died in the River Cam. Fish numbers have not recovered this year. An undeniable and stark example of the damage recent and unmitigated growth is doing to our environment.

- 7.5. Currently the Environment Agency has registered an objection to the Beehive. However, the government has recently put forward the idea of a Water Credits System (WCS) to enable permissions to be given to large scale applications. The WCS would allow developers to buy and sell 'water credits' to offset the additional burden on the water supply their development would bring about.
- 7.6. We understand that through the credit system, water saving devices would be installed within new development, and given free for retrofitting into existing domestic and public buildings. However, water usage within a building is ultimately down to an individual's usage habits – extravagant or otherwise. Any new development will use water!
- 7.7. We would agree with the Cam Valley Forum who have said they are very *"concerned the water credits system will be based on 'unsubstantiated estimated' of future savings, which could be used to justify new developments that will increase water usage"* and are also concerned *"this sort of water credits offsetting scheme has not been done before, there is no evidence that it will work, and the detailed design work has not yet started,"*
- 7.8. Granting planning permission for a scheme that includes yet more high-water demand laboratories in the region, in addition to those already in the pipeline, is a very high-risk strategy.
- 7.9. We are told that eventually there would be a water transfer pipeline from Grafham Water and a new Fens Reservoir. But they are not due for completion until 2032 and 2036 respectively. Even taking into consideration the time it would take to build out the first laboratories on the Beehive site, the concept remains high-risk.

## **Air Quality**

### **In contravention of Policy 36: Air quality, odour and dust**

- 7.10. We are concerned that because the proposals include wet labs there would be more risk to air quality.
- 7.11. Biohazards and airborne pollutants would be generated by almost any laboratory work, and then vented via fume cupboards into the air that all local residents would breathe. Particulate matter would then settle on surrounding lower-lying areas including schools, Coldham's Common etc.

- 7.12. Air quality is a material consideration, and we ask the council to consider very carefully the potential for air pollution including biohazards from laboratories within an urban area and close to residences and public open space.
- 7.13. Proposals for improved transport links to/from the new development include a much higher reliance on buses and the proposed transport hub is in close proximity to residential properties. Unless the bus service providers commit to using only electric buses, a petrol or diesel service would increase pollutants and thus reduce air quality.

### **Urban Heat Island Effect**

**In contravention of Section 4 of the Local Plan as well as Policy 28 - Responding to Climate Change and Managing Resources, the 2020 Sustainable Design and Construction SPD and is in contravention of the City Council's declared Climate Emergency.**

- 7.14. We highlight the existing protections against worsening the Urban Heat Island Effect afforded by both the 2018 Cambridge Local Plan and the Greater Cambridge Sustainable Design and Construction SPD, January 2020.
- 7.15. We point to Policy 28 of the Local Plan which explicitly asserts that development should involve "bespoke assessment methodologies to assess the environmental impact of the proposals".
- 7.16. So important are these considerations that Sections 4.8 and 4.9 under Policy 28 note, respectively state that: "*The Council will be supportive of innovative approaches to meeting and exceeding the standards set out in the policy*"; and that "*It may be possible in some areas for development to exceed the policy requirements set out above*". It is becoming ever more essential for these standards to be implemented, monitored and enforced.
- 7.17. The consideration of 'cumulative impacts' of developments is clearly evident throughout all environmental policies in the 2018 Local Plan. We particularly note the emphasis on "cumulative impacts" bearing in mind the Beehive and other recent similar applications/permissions.
- 7.18. We would also point to the Sustainable Design and Construction SPD with particular regard to cumulative impact. It states in Section 3.6.153: "*A single development may have a very small impact on air quality, but many developments will, together, have a larger impact. For this reason, it is important that:*

- All developments, including minor developments, do not contribute to air pollution
- The cumulative impact of all developments is considered.”

7.19. The intensification of the existing Urban Heat Island Effect (UHIE) is shown in the image below for the Romsey, parts of Petersfield and The Kite areas. Published by the BBC in July 2022.

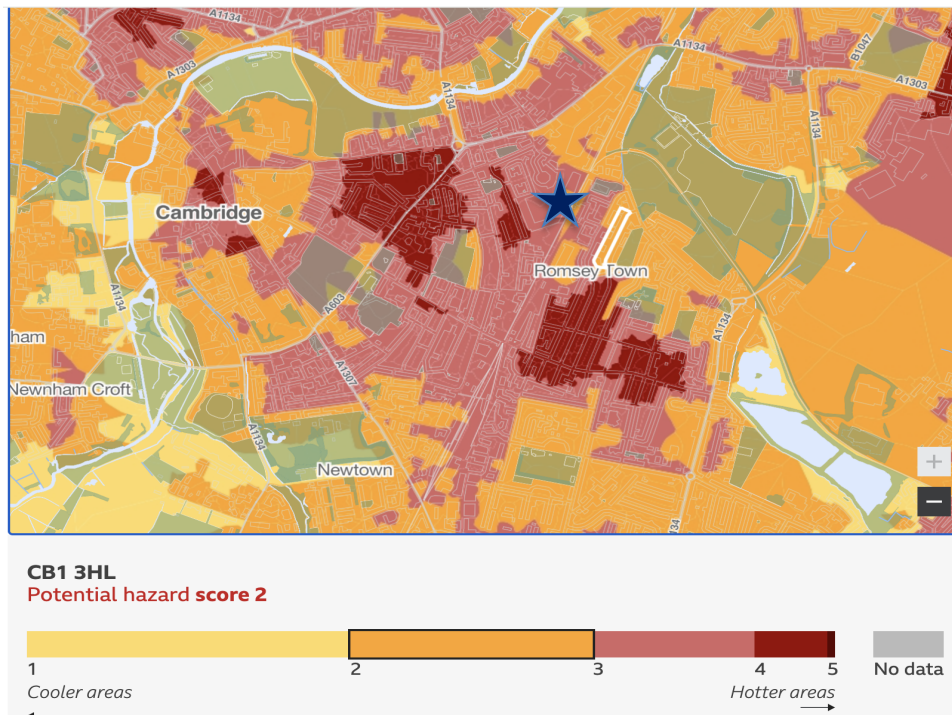


Figure 3 : Degrees of warming in the Cambridge urban areas. Shown in red are the existing heat effects in parts of Petersfield, Romsey and the Kite area.

- 7.20. The Beehive site is indicated by the star, to the northwest of the railway between the dark red areas. The development would exacerbate the UHIE as a result of its additional vertical hard surfaces and roofscapes unless further measures are taken to mitigate the effect. Additional amplification of the problem may also result from the redevelopment of the Grafton Centre.
- 7.21. We note the assessment of building materials that might help in avoiding some of the extra loading of the UHIE. We also recognise the Urban Green Factor exercise carried out for the site. The information in the DAS states that the soft landscape proposals have been measured and calculated in line with Natural England Research Report NERR132 - Urban Greening Factor for England and government guidance on surface types.



7.22. Although we see that the UGF score of 0.32 is slightly better than the target score of 0.3, UGF is a relatively new and basic tool for measuring the amount and quality of greening included within a development proposal. Since it is new the results are, as yet, relatively unmonitored and therefore unproven as to exactly how much mitigation it can bring.

7.23. It is proposed that urban greening would include green walls. We would strongly caution against a reliance on a green wall system of any kind. Since vegetative walls are notoriously difficult to get established and maintained, the architecture of any building must be good enough to stand alone in terms of climate change mitigation, nuisance mitigation and architectural quality.

## **8. Transport and Connectivity**

### **Contravenes Policy 5 : Sustainable transport and infrastructure, Policy 81: Mitigating the transport impact of development**

- 8.1. The Beehive proposals are for a regional scale, high-density employment area. It would pull in thousands of workers daily. A development of that scale needs good public transport accessibility to/from the wider region. That means easy access to a main line train station and/or other mass public transport systems.
- 8.2. The site, and the area generally, is currently poorly connected and poorly served by public transport connections – bus services are infrequent, limited to certain times of day and unreliable due to congestion.
- 8.3. Despite contrary arguments within the application documents, we would say the site also has poor cycling and walking connections to the city centre and transport hubs.
- 8.4. We would emphasise that Coldham's Lane is a busy major thoroughfare which terminates in a T-junction at Newmarket Road and consequently does not flow at all well at peak times. Pedestrian crossing facilities are also under provided at this busy location. The Beehive site, if turned into a large employment area, would undoubtedly worsen local traffic congestion.
- 8.5. As well as developing the Beehive into a high-density employment destination, the proposal is to relocate some of retail units to the Retail Park north of Coldham's Lane. The Beehive development would generate its own traffic numbers which would add to those generated by the relocated retail units therefore adding to the existing congestion problem, particularly at peak times.
- 8.6. The proposal is to encourage a modal shift to public transport and active travel. The Travel Plan identifies several measures to help achieve that shift. Among

such measures listed are funding improvements to bus services to/from Milton Road/Newmarket Road P&R sites, improvements to cycling and walking routes as well as contributing to other County Highways and GCP projects. However, none of these measures can hope to fundamentally improve the basic travel problem Cambridge has of congestion with all of its consequential issues such as delayed travel times, air pollution etc.

8.7. The funding for any improvements to public transport and/or walking/cycling provision is not yet agreed and is “time limited”. We therefore do not know how much funding there would be or how long it would be available. We dare speculate that the budget needed to sustain the proposed additional bus services alone is probably going to be sizeable. Consequently, there is risk built into this strategy such as:

- We note that there is a Lifetime Cap on the funding. If the bus services prove to be unable to be run commercially by the end of the funding period, what happens? Presumably the Transport Authority would have to intervene or the service is reduced/stopped.
- There is the potential to increase car traffic further and cause the surrounding streets to be further plagued with commuter parking issues and more air pollution.
- Improvements to walking routes to existing transport hubs such as the train station would be along narrow Victorian streets with narrow footpaths where pedestrians often have to walk in the carriageway if someone is coming in the other direction. Cyclists are usually squeezed into dangerous positions in the carriageway by vehicles trying over taking them. There is only so much you can do with narrow Victorian streets tightly bounded by private property. (A minor point, but we would challenge the claim of a 15 minute walk to from the Beehive to the station. It would take quite a bit longer to walk 1.25km at a comfortable pace along Sleaford, Ainsworth, Kingston, over Mill Road and along Devonshire Street etc to the station. Other walking times are also underestimated).
- Newmarket Road is currently a better option for frequent bus services into town, but it would be about a 650m walk to/from the furthest plots within the Beehive site which is further than would normally be acceptable (400m).

8.8. We also note the relocation of the multi storey car park to adjacent to the Silverwood Close boundary. MSCPs are not good neighbours as they have associated nuisance of noise and lighting. Greening the elevations would do little to mitigate.

## 9. Green Space and Public Realm

### Contravenes Policy 56 : Creating successful places

- 9.1. We recognise the consolidation of the green spaces and the loss of the wetland and consider both positive moves. We note the Urban Greening Factor calculations undertaken and that the target score has been slightly exceeded.
- 9.2. Nevertheless, we remain sceptical that the extent of the soft landscape and public realm spaces would be enough to mitigate the UHIE. We also remain unconvinced that the spaces around and between the buildings are proportionate compared to the overly large buildings and would not engender good plant growth and a sense of human scale/comfort.
- 9.3. It is disappointing that more space is not allocated for planting trees along the eastern boundary for the benefit of biodiversity and buffering for neighbours on the eastern side of the railway.

## 10. Design Code

- 10.1. We note the Design Code included within the submission and would ask the following questions and observations:
- 10.2. The inclusion of a Design Code in an outline planning application implies that individual plots may not be delivered by the current applicant/developer. If that is a possibility, who would deliver the community spaces, communal green spaces and public realm?
- 10.3. Will each building have to demonstrate its contribution to water usage and the UHIE etc. as well as demonstrate how it would mitigate against environmental impacts?
- 10.4. With regard to the guidance on rooftop plant and flues, we recognise the detail that has been given on the subject, but it may be wise to include an overarching sentence to say that storeys of rooftop plant **MUST** be visually subservient to the rest of the building.
- 10.5. **Flues** – We note that there would be flues on plots 2, 3, 5 and 6 and that the maximum height of the flue(s) would be 25% of the highest point of the building below it (excluding zones of PV without solid parapets), measured from ground floor level. The location of the flues can be anywhere within the area shown as cross hatch on the Maximum Building Heights & Plots Parameter Plan and also shown in Figures 1 and 2 above as solid pink areas.

- 10.6. The Design Code states that the flues *should* a maximum of two stacks per building, they *should* be group together if possible and that their design *should* be 'innovative'. None of these suggestions is mandatory, only advisory. All in all, the Design Code and Parameter Plans aim to make the design, location and height of the flues as flexible as possible. We understand the need for flexibility in a speculative development, but it creates an uncertainty of the exact visual harm of the ultimate flue heights, number and design.
- 10.7. At 3.6.13 amenity terraces are mentioned. Amenity terraces are entirely inappropriate for this site for reasons of visual intrusion / overlooking. Any green areas on rooftops *must* be accessible for maintenance only.
- 10.8. Plot 10 - we note at 5.10.10 *"The architectural treatment of the façade facing Silverwood Close should include incorporation of ground planted green façades."* And at 5.10.16 *"The architectural treatment should include incorporation of ground planted green façades where they may be provided without requiring disproportionate use of mains water for irrigation."* As stated previously green walls of any type are notoriously difficult to establish and maintain and should not be relied on to disguise buildings.
- 10.9. The Design Code does its best to ensure that all negatively impactful building elements are mitigated to some degree. Unfortunately, there is only so much that can be done to mitigate the overall impact of a cluster of very large-scale buildings that have extensive height and massing and have a huge amount of rooftop plants, PVs and extraction flues.

## 11. Precedents and planning balance

- 11.1. We trust that the Grafton Centre approval would not set a precedent for further similar speculative proposals in the urban and suburban areas of Cambridge. Each application should be decided on its merits bearing in mind the cumulative effects.
- 11.2. The Beehive application would undoubtedly set up a precedent for the future height and massing of the nearby Cambridge Retail Park. This can already be seen in the proposals for 230 Newmarket Road, (24/03088/FUL) which is a building considerably higher than anything else on Newmarket Road and has unattractive and noticeably pronounced top and plant storeys. The scale of both the Beehive Centre and the Retail Park should be considered strategically within the emerging plan and not left to speculative planning applications.
- 11.3. If the Beehive is approved, the precedent for limitless and unremitting areas of flat-topped buildings across the city panorama would be permanently set up.

Buildings of the scale and form of the Grafton and Beehive should not be allowed to visually compete with our heritage assets on the historic skyline. The Beehive proposals in particular should be scaled back further or preferably moved to where it can do limited harm.

- 11.4. **Planning Balance** – we would be very surprised and saddened if approval is given to the Beehive application on the grounds of planning balance, i.e. the benefits that the development is thought to bring to the city would significantly and demonstrably outweigh its adverse impacts. We cannot think of any reasonable case for approval on a planning balance argument particularly as we know the Beehive application for lab/office space would put added pressure of the region's water resource, more lab space/offices are not needed in the area and the proposals obviously contravene numerous NPPF and Local Plan policies.

## 12. Conclusion

- 12.1. As stated at the beginning of this objection, our residents' group recognise the need and support the redevelopment of the Beehive Centre in principle. Nonetheless, we do not believe that the revised proposals do justice to the local area or to the city and a better alternative should be found.
- 12.2. Our policy-based objection must be used by Planning Officers and Committee Members to ensure, at the very least, that the scale of the proposals is reduced further, specifically in use, height, mass and number of buildings.
- 12.3. In summary we believe the Beehive proposals, as they stand, have numerous failings and are contrary to current national and local planning policy as follows:
- We question the strategic wisdom of a wholesale change in use from retail to life science labs/research/offices particularly following several recent permissions for lab space/offices in the city and the findings of the most recent Icení Projects report.
  - The proposals remain significantly out of proportion in their height and massing to their immediate suburban context.
  - Through their height and massing, the revised proposals would do considerable harm to local heritage assets, Conservations Areas and the City's historic skyline. Their height would also cause overshadowing, overlooking and overbearing issues.
  - The proposals include limited mitigation to lessen their impact on the local environment in terms of the urban heat island, air quality and how they might affect the regional water resource and consequently harm to human health.
  - Although improved from the existing situation, the green space and greening generally within the proposals is limited mitigation against climate change.

12.4. We believe it would be much more fitting to create an alternative type of development of mixed use at the Beehive site and move away from what is essentially an over-supply, an over developed, large scale, life science/research park in a suburban setting that has limited city/local community benefit.