

BEEHIVE CENTRE
REDEVELOPMENT,
CAMBRIDGE
**STATEMENT OF CASE
FOR THE APPLICANT**

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1.0 Introduction

- 1.1 This Statement of Case (SoC) has been prepared by Bidwells LLP on behalf of Railway Pension Nominees Limited (Railpen) ("the Applicant") in respect of the call-in of an application for outline planning permission, Reference 23/03204/OUT ("the Application"), for the proposed redevelopment ("the Development") of the Beehive Centre, Coldhams Lane, Cambridge ("the Site").
- 1.2 The Description of the Development is:
- "Outline Application (with all matters reserved) for the demolition of existing buildings and structures and redevelopment of the Site for a new local centre (E (a-f), F1(b-f), F2(b,d)), open space and employment (office and laboratory) floorspace (E(g)(i)(ii)) to the ground floor and employment floorspace (office and laboratory) (E(g)(i)(ii)) to the upper floors; along with supporting infrastructure, including pedestrian and cycle routes, vehicular access, car and cycle parking, servicing areas, landscaping and utilities."***
- 1.3 The Applicant will present expert evidence to demonstrate that the Development is in accordance with the development plan when read as a whole, and planning permission should therefore be granted without delay in accordance with the National Planning Policy Framework (NPPF, Paragraph 11c).
- 1.4 The Applicant will present evidence to address the matters which the Secretary of State particularly wishes to be informed about for the purposes of her consideration of the Application, as set out in the call-in letter dated 12 February 2025:
- a) *The extent to which the proposed development is consistent with Government policies for Building a strong, competitive economy in NPPF (NPPF Chapter 6);*
 - b) *The extent to which the proposed development is consistent with Government policies for Ensuring the vitality of town centres in NPPF (NPPF Chapter 7);*
 - c) *The extent to which the proposed development is consistent with Government policies for Achieving well-designed places in NPPF (NPPF Chapter 12);*
 - d) *The extent to which the proposed development is consistent with the development plan for the area; and*
 - e) *any other matters the Inspector considers relevant.*
- 1.5 The Application was called in for determination by the Secretary of State on the morning of the City Council's Planning Committee that was to determine the Application. The Planning Committee Meeting proceeded as planned, but due to the call-in removing the determinative powers of the Council, the Planning Committee discussed and agreed how it would have determined the Application, should they have had the authority to do so.

The Planning Committee agreed unanimously that they would have accepted the Officer's recommendation as set out in the Committee Agenda and Report, namely to refuse the Application based on the single putative Reason of Refusal, as follows:

“By virtue of the scale, massing, and positioning of the maximum building parameters, the proposed development fails to keep potential reductions in daylight and sunlight to a minimum in St Matthew’s Gardens, Silverwood Close and other adjacent properties and gardens. The extent and degree of harm would be both wide ranging, significantly adverse and acutely felt by existing occupants. Many habitable rooms would feel poorly lit, colder, and gloomier, particularly where living rooms are concerned. Multiple gardens would also feel less pleasant and enjoyable, due to the significant increase in overshadowing that would be experienced. Moreover, the proposed development would be overly dominant and imposing on neighbouring properties, particularly in St Matthew’s Gardens and Silverwood Close, resulting in an oppressively enclosed outlook. The overall harm to residential amenity would be significantly adverse and permanent, contrary to policies 55, 56, 57 and 60 of the Cambridge Local Plan (2018) and paragraph 135 (f) of the National Planning Policy Framework (2024).”

- 1.6 The Applicant will also therefore present expert evidence to address the putative Reason for Refusal and demonstrate why the Development should be granted planning permission.
- 1.7 A list of Core Documents (CD) to which the Applicant intends to refer is to be prepared in collaboration with the Local Planning Authority.

2.0 Grounds for the Grant of Planning Permission

2.1 The fundamental case for the Applicant will be:

- 1) The Development is in accordance with the development plan, when read as a whole. It therefore benefits from the 'presumption in favour of sustainable development' as set out at paragraph 11c of the National Planning Policy Framework (NPPF) (the Framework)"(December 2024) and Local Plan policy 1 (The presumption in favour of sustainable development) and should be approved "*without delay*".
- 2) The existing retail use of the Site is not protected nor restricted by any area designation or policy within the Local Plan.
- 3) The Development responds to NPPF Paragraphs 85 and 87 and Local Plan Policy 2 (Spatial strategy for the location of employment development), Policy 40 (Development and expansion of business space) and the Local Plan 'Growth Strategy' Paragraphs 2.35-2.39 all in respect of providing flexible, high-quality laboratory and office floorspace in a sustainable location which will add to the "cluster" of high technology, knowledge-based industry.
- 4) In addition to supporting economic development, the Development specifically contributes to the National ambition for the growth of Cambridge as a leading location for life science and technology sectors. The Development will provide best-in-class office and laboratory space set within a high quality design in a sustainable location. As such, the Development provides a rare opportunity to contribute at scale to the life science ecosystem on previously developed land within the city.
- 5) The Development makes an effective use of previously developed land (PDL) ('brownfield land') as directed by NPPF Paragraph 124. The Development would deliver an identified need on suitable land, so the value of this should be given substantial weight in accordance with NPPF Paragraph 125c.
- 6) The Development responds to the City Council's declaration of a Climate Emergency and a Biodiversity Emergency, addresses NPPF Paragraphs 163-164 and exceeds Local Plan Policy 28 by surpassing requirements in respect of sustainability and biodiversity net gain (BNG).
- 7) Addressing Local Plan Policies 55, 56, 57, 59, 60 and 61, the design of the Development responds directly to its context and will deliver a scheme of exceptional design, which is sensitive to the neighbouring Conservation Area and other designated and non-designated heritage assets, including within viewpoints of the city.
- 8) Whilst the Development will result in harm to the contribution that setting makes to the significance of some of the identified designated heritage assets, including Mill Road Conservation Area, the level of harm identified is considered, in all aspects, to represent "less than substantial" harm in the context of NPPF Paragraph 215 and is demonstrably outweighed by an extensive public benefit case.
- 9) There is no harm to non-designated heritage assets in reference to NPPF Paragraph 216.

- 10) The Development design has been informed by an iterative process, which has taken into account townscape analysis with due consideration of its impacts within the local and wider visual context in accordance with NPPF Paragraph 135.
- 11) The Development will function well and make a long-lasting addition to the quality of the city in accordance with NPPF Paragraph 135. It will provide an extensive and effective enhancement to the environment and public realm and create an inclusive place with a strong sense of place, knitted into the city, while forming a distinctive place in its own right.
- 12) The Development is well designed at the outline stage to ensure that it will contribute positively to the local context and mitigate appropriately against any impacts in response to local design policies and government guidance on design. It secures an outstanding design to promote a high level of sustainability and to locally raise the standard of design more generally. The Development responds well to NPPF Paragraphs 137-139 and the significant weight it gives to such schemes.
- 13) The Development will deliver net gains to economic, social and environmental objectives in respect of achieving sustainable development, in accordance with NPPF Paragraph 8.
- 14) The Council wants to see the Site 'reimagined' and is supportive to the principle for the redevelopment of the Site for the intended uses and design approach, a matter that is expressed strongly within the 12 February Planning Committee Report. There is only one principal matter between the parties relating to residential amenity to specific residential properties, which is a matter related to detailed design and controlling the Development by the outline consent and at reserved matters stage.
- 15) The relationship of the Development to neighbouring residential properties has informed the design evolution and the final form of the Development Proposal. This has included a consideration of the baseline residential amenity context, outlook, daylight and sunlight in reference to BRE guidance and appreciation of the opportunity to optimise the use of land and meet an identified need. The scheme has evolved throughout the design process during pre-application and through the formal planning application process to respond to matters of residential amenity to neighbouring properties. The outcome of this iterative and informed process is set within the proposed Parameter Plans and Design Code to control the scheme, including in relation to matters of residential amenity.
- 16) The Development will deliver substantial planning benefits. When weighed against the adverse impacts arising, the planning balance finds strongly in favour of the grant of planning permission.

3.0 The Site and Context

- 3.1 The Site lies within the jurisdiction of Cambridge City Council. Cambridgeshire County Council is the Highway Authority for the Site.
- 3.2 The Site, known as 'The Beehive Centre' is situated approximately 1.5km to the east of Cambridge City Centre (10 minutes' cycle and 20 minutes' walk) and 1km from Cambridge Station (5 minutes' cycle and 15 minutes' walk). It is a highly sustainable location within the urban area.
- 3.3 Extending 7.58 hectares, the Site currently comprises of a retail park with extensive surface car parking; the entirety of the Site is classified as PDL.
- 3.4 Coldham's Lane forms the north-eastern boundary of the Site. The rear of residential properties on Silverwood Close and St Matthews Gardens form the north-western boundary. The railway line lies to the south-east of the Site, with Sleaford Street to the south. The western boundary is formed by the rear of residential properties on York Street. The surrounding residential properties include a mix of two-storey Victorian properties, semi-detached post-war houses, three storey town houses and apartment blocks.
- 3.5 Vehicular access to the Site is via Coldham's Lane. In addition, there are existing pedestrian and cycle access points into the Site via St Matthews Gardens to the north, York Street to the west and Sleaford Street to the south.

4.0 Development Plan

- 4.1 National Planning Practice Guidance sets out that “To the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004” (Determining a Planning Application, Paragraph 006).
- 4.2 The Development Plan for the Site is formed of:
- Cambridge Local Plan 2018 and its Policies Map 2018
 - Cambridgeshire and Peterborough Minerals and Waste Plan (2021)
- 4.3 The Site is ‘white land’ on the Policies Map. It is not allocated or designated within the adopted Local Plan.
- 4.4 The Site lies adjacent to the Mill Road Conservation Area.
- 4.5 The figure below is an extract from the Policies Map, with the Site overlaid.

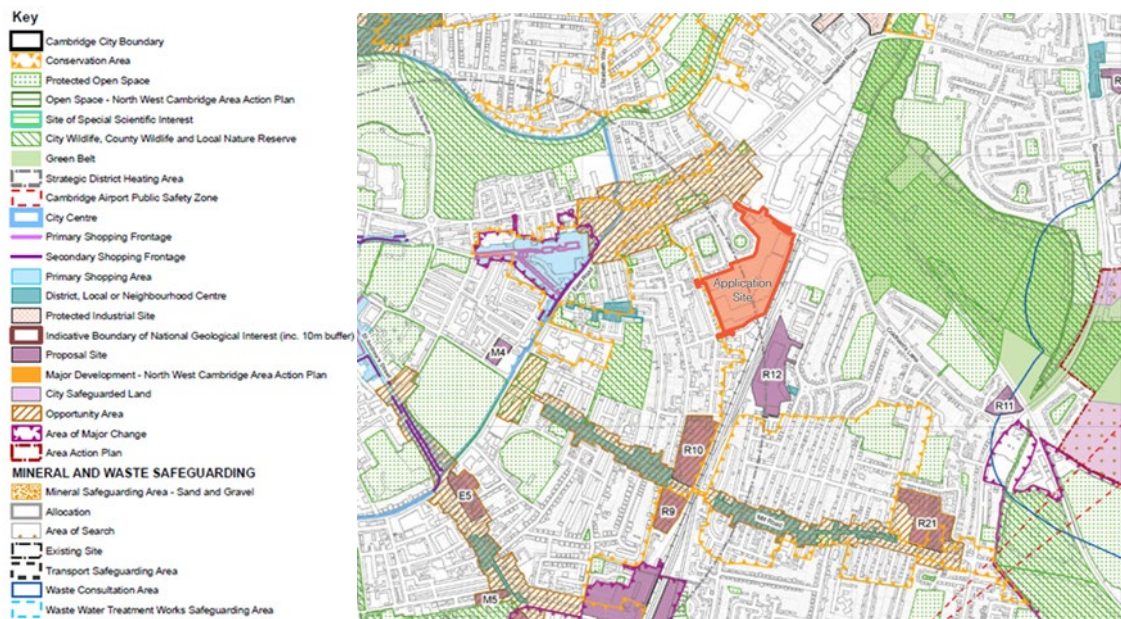


Figure 1: Extract of the adopted Cambridge City Local Plan Proposals Map – site identified by red line and colour wash

- 4.6 There are no policies within the Local Plan that protect the existing retail use of the Site.

- 4.7 Whilst the emerging Joint Local Plan is currently given very limited weight in the determination of planning applications, it is notable that the Beehive Centre is draft allocated as a new Opportunity Area (S/OA/BC), with *“the potential to provide a significant opportunity for reimagining this area close to the heart of Cambridge”*.

5.0 Planning Application Process to Date

- 5.1 The Applicant and its project team has undertaken an extensive programme of consultation and collaboration from the outset of the project to inform its design and composition.
- 5.2 The NPPF (Paragraph 40) sets out that pre-application engagement by prospective applicants offers significant potential to improve the efficiency and effectiveness of the planning application system for all parties. It states that good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community. Its Paragraph 137 goes on to say that *‘Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot’*.
- 5.3 The Statement of Community Involvement (SCI) and SCI Addendum sets out the detail of the consultation process undertaken. The objective of the engagement process has been to ensure that the community has had repeated opportunity to understand and help shape the proposals to ensure the best possible outcome and the delivery of substantial benefits to the area.
- 5.4 The consultation has been delivered through a number of activities, including:
- Public drop-ins at three key stages.
 - Printed newsletters, sent to 6,500 surrounding addresses in advance of each phase of the public consultation, along with social media and press adverts; notifications to over 70 stakeholders; and tenant communication via the managing agent of the Beehive Centre.
 - A project website (www.beehivecentreconsultation.co.uk) which provides easy access to information about the project, much of which is downloadable. There was also the opportunity to give comment or contact the team with any questions via the website.
 - Stakeholder briefings to ensure a full understanding of the aspirations behind, and the details of, the proposals.
 - Thematic workshops for engaged community groups. Workshops were held after the first phase of consultation to provide an opportunity for community groups and individual residents to engage in specific topic areas of interest.
 - Youth engagement, including specific engagement sessions with Cambs Youth Panel, Make Space for Girls, Cam Skate and Red2Green.
- 5.5 The public consultation strategy has involved four main stages of consultation in relation to wide-reaching public engagement, as follows:
- Phase One: June to July 2022 – the objective was to gain a better understanding of the local area and the community’s aspirations. In addition to the formal public consultation events and feedback opportunities that were open to all, the independent social enterprise company Social Life was commissioned to better understand how the project could better meet local needs and build on what is already succeeding in the area. Social Life carried out 84 street interviews and 15 local stakeholders from local groups and organisations were interviewed.

- Phase Two: November to December 2022 – this consultation introduced a masterplan for the redevelopment, including early designs and sketches of the emerging proposals.
- Phase 3: June to July 2023 – the final pre-application consultation stage presented how the masterplan had progressed in response to feedback received in the earlier phases.
- Phase 4: July 2024 – the most recent consultation included an update to the community regarding the additional work that has been undertaken with Officers and stakeholders following the formal submission of the Application and statutory consultation. The revised masterplan was presented with material explaining the scheme changes and design development, leading to the formal amended submission to the Application in August 2024.

5.6 In addition to wider public consultation and formal engagement with statutory consultees, the Applicant has undertaken extensive engagement with a range of local stakeholder groups. Key groups and organisations include:

- Abbey People;
- Indie Cambs;
- Cambridge Science Centre;
- Cambs Youth Panel;
- Form the Future;
- Red2Green;
- Cam Skate;
- Make Space for Girls;
- Cambridge Past, Present and Future; and
- Cam Cycle.

5.7 The engagement and consultation undertaken has resulted in direct and significant alterations to the Development. These changes clearly demonstrate how the Applicant has listened to feedback across the pre-application process, and has adapted designs, where possible, to incorporate suggestions from stakeholders and the local community.

5.8 Significant changes to the Development have resulted along the design evolution of the Development as detailed within the Design and Access Statement Addendum and described in the Statement of Community Involvement. The type and form of the community facilities within the proposals have also resulted from the pre-application and application stages of engagement, including a design that can cater for:

- Cambs Youth Panel community space,
- STEM educational space,

- 'Skatable' spaces within the hard landscaping,
- Inclusive open space, supported by a Wayfinding Strategy, and
- A flexible Community Hub space.

- 5.9 As a significant part of the pre-application process the Applicant has engaged with Officers since March 2021 across a sustained and prolonged period of time through a structured series of meetings and workshop sessions pursuant to a Planning Performance Agreement. This has been a constructive dialogue and has informed and shaped the proposals.
- 5.10 The proposal has been reviewed and commented upon by Council's Design Review Panel at three stages in the design process. The final form of the scheme has responded to the comments made as described by the Design and Access Statement and its Addendum.
- 5.11 Following on from the formal submission of the Application in August 2023 and the statutory consultation period, extensive further engagement was undertaken with Officers at the LPA. This included Planning, Urban Design, Conservation, Tree and Sustainability Officers as part of a collaborative approach to review and refine the masterplan, Parameter Plans and Design Codes to address consultee comments received to the Application. This process and associated timeline are detailed in the DAS Addendum and directly informed the substantive changes made to the amended scheme that comprises the final application proposals.
- 5.12 In addition to engaging with Officers at the LPA, the Applicant team has also undertaken coordinated pre-application and post-submission consultation with Cambridgeshire County Council as the Highways Authority and the Lead Local Flood Authority, and Historic England.
- 5.13 Residential amenity has been a part of the scheme discussions and evolution with Officers at the LPA, but the Council only instructed a daylight and sunlight (DLSL) expert very late in the process and only enabled the first discussion between the DLSL experts from each party to take place on 28 January 2025, prior to the Planning Officers writing on 31 January to state their intention to refuse the Application. The 31 January Officer letter was unilaterally issued to the Applicant notwithstanding there were areas for further discussion and understanding between the parties identified at the 28 January meeting, and ones which the Applicant had expressly agreed to continue working with the LPA on.

6.0 The Proposed Development

- 6.1 As an outline scheme, the Application proposes that planning permission will be principally controlled by a number of documents for approval, as follows:
- Demolition Plan;
 - Land Use – Ground Floor – Parameter Plan;
 - Land Use – Upper Floors – Parameter Plan;
 - Access and Circulation Parameter Plan;
 - Landscape and Open Space Parameter Plan;
 - Maximum Building Heights and Plots Parameter Plan; and
 - Design Code.
- 6.2 Future reserved matters applications would be prepared in accordance with the Parameter Plans (PPs) and Design Code.
- 6.3 The PPs were designed by the Applicant to give a high degree of certainty to the general arrangement of the layout and the volumetric maximums for each individual building within its own defined building plot. The Design Code was volunteered by the Applicant as a document to support the Application and to be controlled by a planning condition to add a high degree of certainty to the layout, form and quality of the Development.
- 6.4 The Development includes the demolition of all existing buildings on the Site, which comprise of 22,637 sqm GIA (24,382 sqm GEA) of existing retail and ancillary floorspace. Of the existing trees on-site, the proposal retains and protects 58 trees and removes 61 trees.
- 6.5 The Development includes ten principal buildings, with nine comprising commercial buildings (for office, laboratory or local centre uses) and one building forming the multi-storey car park with accommodation for community and local centre uses at its ground floor.
- 6.6 Each of the proposed ten principal building plots is controlled with its own defined parameter controls across the suite of Parameter Plans. To compliment and deliver to the site-wide design principles that support the design approach described in the Design and Access Statement, each plot is governed by site-wide and plot specific Design Code requirements tailored to its individual opportunities, constraints and contextual response. The plot specific codes provide further control over the design of each building to those already set into the PPs, thereby ensuring the delivery of high-quality buildings set within responsive and distinctive character areas. A planning condition will require each reserved matters application (RMA) proposal to demonstrate compliance with the Design Code.
- 6.7 The PPs could deliver a theoretical maximum Gross Floor Area (GEA) of 166,685 sq.m., as recognised by the Committee Report (paragraph 3.4).

- 6.8 An Illustrative Masterplan was developed as part of the pre-application process to support the original planning application submission of August 2023 and was revised through the post-submission engagement process to support the formal application amendment in August 2024. The revised Illustrative Scheme (IS) provides a high-quality representation of one way in which the Development could come forward at reserved matters stage, showing a mixed-use laboratory and office led scheme.
- 6.9 The IS illustrates the maximum scale of the overall development that could be delivered within the controls of the PPs and Design Code as a mixed-use laboratory and office led-scheme, with Plots 2, 3, 5 and 6 designed as wet-lab buildings. The IS is an illustrative proposal that represents the theoretical GEA maximum of 166,685 sq.m.

Vision

- 6.10 The Development will create a high-quality new local centre, workplace and innovation cluster. The Design and Access Statement and Design Code envisage a vibrant, landscape-led, mixed-use urban quarter. The local centre provides opportunities and flexibility for shops, cafes, restaurants, services, leisure facilities, health and wellbeing establishments and co-working spaces at ground floor level, set within a new extensive area of public realm, with office and laboratory workspaces at upper floor levels of nine of the proposed buildings.
- 6.11 Sustainability is a key focus, with the buildings designed to be highly sustainable and achieving stringent and accredited targets. Alongside this, the landscape strategy will deliver significant ecological enhancement and biodiversity net gain (BNG). The masterplan has been designed in conjunction with a transport strategy including on and off-site initiatives which will support a significant modal shift in the way people access the Site, with many more trips than currently being made by sustainable means including walking, cycling and public transport.
- 6.12 The Development will deliver a reimagined comprehensive transformation of the Site from its current form as a retail park which is spatially dominated by surface car parking and currently prioritises access by private vehicles. The proposals will provide a new high quality designed destination for the local community, with a range of tangible benefits, including substantial new public open space. In addition to creating a range of job and training opportunities, the Development will deliver some community space and will provide spaces for formal and informal recreation, relaxation and socialisation.
- 6.13 The outcome of the Beehive Redevelopment will be a new local centre that includes a vibrant mixed-use ground floor at the heart of a new employment location. A highly sustainable development including extensive open space and landscaping, the Site will provide a welcoming environment for everyone, all day and every day. Well-connected, the Site will prioritise pedestrian, cycle and public transport access via a range of on- and off-site measures. The scheme will create a range of new jobs in an edge-of-centre sustainable location, with a package of interventions within an Employment and Skills Strategy to increase the opportunities for access to jobs for all. The cumulative benefits of the scheme across economic, social and environmental objectives will be substantial, as described in later sections of this Statement.

Character areas

- 6.14 There are six masterplan character areas that help to define the proposal, described in detail in the DAS and underpin the Design Code:
- Abbey Grove – would be the sole vehicle entry road, and will include a cycle path, new tree planting and three new workplace buildings.
 - Garden Walk – is a pedestrian-friendly linear green space connecting Abbey Grove with the larger public open spaces of Maple Square and Hive Park to the south. It forms part of the Beehive Greenway, lined with rain gardens and with shops and cafes forming active frontage to both sides.
 - Maple Square – forms the main open civic square which will retain existing trees, complemented by new tree planting and rain gardens. The Square will provide an amenity space for community events, installations and celebrations.
 - Hive Park – situated at the southwestern entrance to the Site (from Sleaford Street), Hive Park will provide a large south-facing park which will provide informal recreational space.
 - The Lanes – form a key piece of the urban design that will connect York Street and St Matthews Gardens directly to the centre of the Beehive Site. These linear spaces will include planting and trees, a collection of streets that will be activated by retail and mixed use spaces.
 - Railway Corridor – is a linear space that runs parallel with the railway line and forms a functional spine that houses the more demanding service areas.

A new local centre and community pavilion building

- 6.15 The Development will provide a new local centre providing for a vibrant mix of uses at ground floor level placed within an extensive public realm setting.
- 6.16 Of the ten blocks within the Development, seven blocks will include active local centre uses at ground floor level as set into the Parameter Plans. The active mixed-use ground level floorspace will form a new local centre to include around 17 units of a range of sizes. The design documents include an illustrative mix of uses within the new local centre to inform the layout and landscape structure. The indicative mixed-use 'local centre' floorspace suggests a split for food and beverage (50%), convenience (20%), comparison (13%), leisure (10%) and community uses (7%).
- 6.17 The Illustrative Masterplan has been designed to include extensive active frontages envisaged through the key frontages within the Site, so creating a coherent space that is welcoming, vibrant and adds to the quality of place. The arrangement of local centre uses has been arranged to activate spaces between the buildings, maximising activity in the publicly accessible streets and open spaces that they open onto. The new public realm and green spaces will provide places to sit, eat, drink, play and enjoy the landscape.
- 6.18 A Local Centre and Public Realm Strategy accompanies the Application to express in greater detail the vision for the new Local Centre and then a strategy for how the vision will be delivered managed and maintained. It foresees that a Local Centre and Public Realm Delivery Plan will follow a consent to set out the local centre detail, building on the Strategy.

Public realm and landscape

- 6.19 58 existing trees will be retained within the development. Individual and groups of trees to the boundaries of the Site are to be retained and enhanced wherever possible. This provides amenity value to the Site and surrounding areas. They are also an important asset to the existing ecology and biodiversity of the Site.
- 6.20 The setting of the retained trees will be considerably enhanced by a site-wide landscaping strategy which will include substantial new planting. The illustrative masterplan envisages that approximately 290 new trees will be planted. Native species will be considered for all locations as this is preferable for biodiversity and local character, along with climate resilient species and those specimens that will be of a large scale and long-life. The masterplan is strongly landscaped, and the proposals include 2.63 ha of landscaping which will provide significant ecological enhancement including a range of new habitats.
- 6.21 The hard and soft landscaping strategy has been developed in close collaboration with the drainage strategy, as well as the ecology strategy. Sustainable drainage systems (SuDS) will be utilised, including the use of permeable paving and rain gardens. Overall, across the Site, the masterplan will target delivery of a significant ecological uplift of at least 100% BNG.
- 6.22 Significant areas of accessible and useable public open space will be created within the public realm and wider landscaping. This includes a substantial new park and a civic plaza.

Transport and access strategies

- 6.23 The Site occupies a highly sustainable, edge-of-centre location within Cambridge. It benefits from a large catchment of people within walking and cycling distance, so the Development can promote travel by active and sustainable modes. Accessibility will be significantly enhanced by a range of on- and off-site transport initiatives which will promote a significant modal shift away from car use towards active and sustainable travel modes.
- 6.24 In addition to vehicular and multi-modal access from Coldham's Lane, the Site has three further points of access by foot or cycles. These points of access will all be retained but vastly improved through the Development, enhancing accessibility to the Site via sustainable and active transport. The access points have been designed into the masterplan with cross-site transit routes that deliver significantly improved site permeability by foot and cycle. On-site cycle routes will take account of LTN 1/20 standard and carefully designed to reduce potential conflict.
- 6.25 The Site is situated approximately 5 minutes' cycle and 15 minutes' walk from Cambridge Railway Station. This presents an opportunity to promote rail travel to the Site, and the Development will facilitate the use of the existing road and cycle network through improved legibility and signposting.

- 6.26 The transport strategy has been developed with close consultation with a range of stakeholders and takes full consideration for local projects and aspirations within the vicinity of the Site. This includes the cycle network enhancements along Newmarket Road and the extension of the Chisholm Trail (Phase 2) to extend from Coldham's Common to Cambridge Railway Station and further initiatives promoted by the Greater Cambridge Partnership.
- 6.27 Across the Development, a total of 4,593 cycle parking spaces are accounted for. Each of the commercial buildings will include their own end-of-journey facilities for cyclists and other non-car commuters, including showers and changing rooms, but supplemented by cycle parking hubs that provide further shared cycle facilities. The provision will be at a ratio of one shower/changing room per 25 cycle parking spaces and one locker per cycle parking space.
- 6.28 There is an existing bus stop within the Site, and this will be re-provided within the Development along the one-way vehicular loop. An improved bus service will be delivered to promote the use of public transport. Advanced discussions with operators have achieved a commitment to providing 15 bus services to service the Site during peak travel periods. This represents a significant improvement on current provision and will be provided as public bus services to be available to the whole community. This significant uplift in bus provision will facilitate the increased use of public transport by workers, visitors and the local resident population.
- 6.29 The masterplan includes 395 car parking spaces within the Site, which is over a 50% reduction in car parking as currently on site. 374 of the proposed car parking spaces will be within a multi-storey car park (MSCP) and will be subject to a Car Parking Management Plan. A further 21 accessible car parking spaces are envisaged at grade through the site to provide some accessible 'blue badge' car parking close to each of the buildings. This is a total reduction of 490 car parking spaces when compared to the existing retail park use (885 existing spaces) and will support the proposed reduction in car modal share.
- 6.30 A Framework Travel Plan (TP) by Watermans supports the Application and sets out the on-and-offsite transport initiatives that will deliver a significant modal shift in the way people access the Site. The Travel Plan would be kept under review through the development build-out under a manage and adapt approach to ensure it remains up-to-date and the most appropriate travel plan as the scheme is built-out and the transport infrastructure changes in the locality.

Energy, water and sustainability strategies

- 6.31 Sustainability considerations have been embedded within the scheme design from its earliest conceptualisation. Ambitious but achievable targets have guided the scheme development. The energy strategy for the Development has been developed using an energy hierarchy as follows:
- Be lean – incorporating passive measures into design to use less energy.
 - Be clean – supply energy efficiently.
 - Be green – utilising Low and Zero Carbon (LZC) technologies as energy sources, including via air source heat pumps (ASHPs) and roof-mounted photovoltaics (PVs).
 - Be seen – monitor and report operational energy against targets.

- 6.32 In order to ensure that less energy is needed at the operational stages, a range of measures have been designed into the scheme from the outset and includes consideration of fabric performance (improving building fabric efficiency), glazing ratios (balancing daylight comfort and passive heating), using high efficiency LED lighting throughout and using appropriate metering and controls.
- 6.33 In terms of energy supply, the Site will be all electric, including heating, cooling and hot water provision. Photovoltaic (PV) and air source heat pumps (ASHP) are technologies that form part of the strategy to utilise zero and low-carbon energy sources.
- 6.34 In terms of BREEAM Ene 01, all office floorspace will achieve 6 Energy Credits and therefore Outstanding rating. All other floorspace (save for the multi-storey car park) will achieve 4 Energy Credits and therefore be classified as Excellent (as a minimum).

Water Strategy

- 6.35 Site-wide water management is proposed, developed in parallel with the drainage strategy. Below-ground attenuation storage is proposed alongside the SuDS strategy to achieve greenfield (pre-developed) run-off rates.
- 6.36 Extensive areas of green and blue roof attenuation are proposed on selected buildings and this is designed into the masterplan to ensure appropriate attenuation capacities can be achieved. Rainwater will be captured for re-use on the Site, reducing water consumption in buildings and providing rainwater irrigation for landscaping areas.
- 6.37 In addition to designing in water re-use and drainage attenuation measures, detailed building design will include high efficiency and low-flow outlets wherever possible.
- 6.38 All five sustainable water use BREEAM credits will be achieved in the Development, including a strategy to target the exemplary performance credit associated with water recycling for each plot, which outperforms adopted Local Plan policy.

Jobs and Employment

- 6.39 The Development will support the local economy by supporting the important and recognised knowledge-based industries, the R&D sector and the life science sector. The proposals will be able to accommodate a host of commercial requirements and company sizes. The new local centre will also add to the number and type of jobs available.
- 6.40 There is a targeted commitment to promoting education and employment for local people through skills development and career support as presented in the volunteered and bespoke Employment and Skills Strategy (ESS) accompanying the Application. The ESS identifies shortfalls and skills gaps in the locality and concludes with an action plan for how the Development will actively pursue a programme to help address those shortfalls.

- 6.41 The approach is aligned with the with Council's 'Community Wealth Building Strategy' of March 2024, which looks at 'the barriers that cause poverty in Cambridge' and includes a host of strategies including 'Shaping Abbey', a particular focus on the Abbey ward, being the ward in which the Site is located.

Embodied Carbon

- 6.42 As set out in the Sustainability Strategy (by Hoare Lea), assessment of embodied carbon has been undertaken throughout the masterplan design and this will continue through the detailed design and construction phases of the Development. This will include pre-demolition audits to identify materials for potential re-use from the demolition phase. In addition, the scheme will be targeting an upfront embodied carbon target of 600kgCO₂/sqm for base-build office buildings with a stretch target of 500kgCO₂/sqm. The scheme will be targeting 750kgCO₂/sqm for base-build laboratory buildings. The proposals exceed adopted policy on such matters.

Sustainability Targets

- 6.43 The Sustainability Strategy sets out the policy requirements and guidance that have been used to advise on the emerging sustainability standards for the Development. The Development will incorporate ambitious but deliverable sustainability targets and is designed against recognised accreditations.
- 6.44 A high-level summary of sustainability targets includes the following:
- All nine workplace buildings will be high performing, achieving a minimum BREEAM score of 85%.
 - The laboratory workplace buildings will achieve a BREEAM certification of Excellent, with a push target to achieve Outstanding.
 - The office floorspace will achieve a minimum BREEAM certification of Outstanding,
 - The ability for all commercial buildings to achieve Outstanding is currently limited only by Energy Consumption, which is particularly challenging for Wet Lab buildings.
 - NABERS score of 5.
 - Wirescore – Platinum enabled.

Social value strategies

- 6.45 The Development has been designed so that it will deliver a range of social infrastructure that directly responds to the identified needs of the local community. The Applicant employed an independent social enterprise (Social Life) to undertake a Social Infrastructure Assessment of the area around the Beehive Centre at the outset of the proposal.

This provided a deep understanding of the Abbey, Romsey and Petersfield wards (being the ward within which the Beehive Centre sits, and the adjacent two wards given the close proximity of the Beehive Centre to the 'junction' of these three wards), and how the existing Beehive Centre is used and accessed.

6.46 A Social Infrastructure Strategy by Volterra supports the Application. It summarises the key social initiatives that the Development will deliver to address identified shortfalls and needed facilities that have been identified through stakeholder engagement with local organisations, the community and delivery partners. It also provides the mechanism for delivering the benefits, which will be secured through planning conditions and obligations. Key initiatives include:

- Ongoing community work, engaging with local delivery partners.
- Flexible community space, creating a 'Community Hub' with spaces to host a range of activities.
- Inclusive spaces across the development, focused on ensuring that all open spaces are safe and welcoming for all, with key inputs from Make Space for Girls.
- Design principles to include for 'Skatable' spaces, with key inputs from Cam Skate to co-design skatable streets and furniture within parts of the hard landscaping scheme.
- A STEM-oriented educational resource space, providing hands-on learning space in partnership with the Cambridge Science Centre.
- An educational programme in partnership with Form the Future, providing skills so that people can access new local job opportunities.
- Active frontages coordinated with open space to create clear legibility as set out in the Outline Wayfinding Strategy.

Residential Amenity

6.47 The relationship of the Development to neighbouring residential properties has informed the design evolution and the final form of the Development .

6.48 The proposal has been subject to extensive and repeated consultation with stakeholders, the community and the Authorities. The relationship between the Site and neighbouring properties has been a consistent part of the scheme considerations.

6.49 The design evolution considered matters including the baseline residential amenity context, outlook, noise and disturbance, overlooking, daylight, sunlight and overshadowing in reference to BRE guidance (BRE209:Site Layout and Planning for Daylight and Sunlight – A Guide to Good Practice (June 2022) 'BRE209') and an appreciation of the opportunity to optimise the use of land to meet an identified need. The scheme has evolved throughout the design process during pre-application and through the formal planning application process to respond to matters including residential amenity to neighbouring properties.

- 6.50 This has included major design responses such as the positioning of buildings, setbacks at upper building levels controlled by the Parameter Plans and space for meaningful landscaping along the shared boundaries. The scheme further responds to neighbouring properties within the Design Code through additional planning controls to ensure continued and appropriate consideration of any impacts on neighbouring properties through the reserved matters stage.
- 6.51 The scheme design has evolved to minimise any potential negative impacts as part of a balanced approach to optimise the effective use of suitable brownfield land, to ensure effects are acceptable to reflect Local Plan policy and BRE209 requirements.

7.0 Case for the Proposed Development

- 7.1 The Applicant will present evidence that makes a compelling case for the grant of planning permission to deliver a high quality scheme that will deliver substantive public benefits.
- 7.2 The Committee Report and Statement of Common Ground (28 March 2025) present clearly that the Planning Authority is supportive of the scheme as a whole across the reuse of brownfield land, the overall quality of the design and its beneficial impacts across economic, social and environmental objectives. It is deeply unfortunate that the Authority moved unexpectedly and late in the process to recommend refusal on a single matter of detail related to residential amenity, because unequivocally there is a tremendous amount of common ground to a shared ambition to see the scheme delivered; albeit the Council has concerns on a part of the scheme and its impact on a small number of neighbouring properties.
- 7.3 The evidence will also be formed in recognition of the Call In letter of 12 February 2025 and the matters that the Secretary of State wishes to be informed about.

Building a strong, competitive economy

- 7.4 The Applicant will provide evidence to explain the positive contribution the Development will make to help build a strong, competitive economy.
- 7.5 The Site is well located for new employment uses in Cambridge, being a sustainable brownfield location within proximity of the City Centre, the key academic departments and institutions of the University, and easy distance of the railway station. The Development will create a new research and innovation location, with the flexibility to provide office and dry or wet laboratory floorspace to meet market demand through a phased and responsive approach to delivery.
- 7.6 The proposals support the ambitions of the Local Plan's Spatial Strategy (Section 2), meeting the need for new employment land in a way that respects "Cambridge's constraints" as noted by the Local Plan:
- *"Cambridge's outstanding historic environment, which is of international, national and local significance;*
 - *limited supply of available land, as well as conservation constraints;*
 - *transport (and other) infrastructure under pressure; and*
 - *the Cambridge Green Belt."* (Local Plan Paragraph 2.20)
- 7.7 The joint spatial approach for Cambridge and its sub-region (both Cambridge City and South Cambridgeshire) set out in the Local Plan (Paragraphs 2.22-2.34) includes a *"preferred sequential approach for new development"* which prioritises sites within the existing urban area of Cambridge (Paragraph 2.27).

- 7.8 In the context of the city's acknowledged constraints and the preferred locational approach, the Site provides a rare opportunity to provide a significant, strategic-scale employment development on PDL in a sustainable, central location whilst reducing pressure on the historic core and the Green Belt. This aligns fully with the Local Plan's Spatial Strategy.
- 7.9 In terms of the Spatial Strategy specific to the location of employment development, Local Plan Policy 2 states:
- "The strategy will be to support Cambridge's economy, offering a wide range of employment opportunities with particular emphasis on growth of the Cambridge Cluster of knowledge-based industries and institutions and other existing clusters in the city, building on existing strengths in 'knowledge-based' activities. Proposals that help reinforce the existing high technology and research cluster of Cambridge will be supported".*
- 7.10 The Development fully accords with the stated aims and objectives of Policy 2, delivering the types of employment space that are appropriate to support the "Cambridge Cluster" and to provide a diverse range of local jobs to ensure a strong and vibrant local economy into the future.
- 7.11 Local Plan Policy 40 sets out specific locations for the development and expansion of business space in the City. In addition to those identified, the policy sets out that proposals for new offices, research and development (R&D) and research facilities will be considered elsewhere in the City based on their merits and other policies. The Development is fully compliant with the aims of Policy 40. Additionally, it fully embraces the intent of the second element of Policy 40 which states that,
- "...Development of larger employment sites, with multiple occupiers, should consider whether they want to provide shared social spaces within the site, to enhance the vitality and attractiveness of the site."*
- 7.12 The Development will assist in meeting some of the anticipated and growing needs for office and laboratory space in Cambridge. As stated by Officers in the Committee Report (Paragraph 13.19):
- "The current outline planning application through its scale, design and edge of centre location, provides an important opportunity to secure an identified need for office and lab floorspace in the City. Supporting the proposals in this instance recognises the inherent challenges in delivering physically available and viable floorspace in the short to medium including the contribution it can make in order to maintain the Cambridge region as a national and global destination for life sciences and ICT research in the much longer term."*
- 7.13 At the national level, there continues to be a strong policy imperative for the growth of Cambridge. The previous Government identified a vision for Cambridge as *"Europe's science capital"* with the [Case for Cambridge \(March 2024\)](#) setting out their ambition for the City as a catalyst for the growth of the UK economy, particularly focused around the life science and technology sectors. The current Government has built on this foundation, stating that *"we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy"* ([Matthew Pennycook Letter to Local Leaders, 23 August 2024](#)).

The Cambridge Growth Company has been tasked with advising Government and driving forward their ambitions for the area, including for the appointment of Peter Freeman ([Matthew Pennycook Letter, 30 October 2024](#)) and expressly stating that “[t]he success of Greater Cambridge is a national priority for this government”. The November 2024 Green Paper, [Invest 2035: the UK’s modern industrial strategy](#) (Department of Business & Trade) identified Cambridge as a high-performing life science cluster where “*planning constraints hold back growth*”.

7.14 Whilst the growth vision for Cambridge is yet to be implemented into planning policy, there is a strong policy imperative for supporting economic growth in the Greater Cambridge area. The Development will make a significant contribution towards delivering new employment floorspace to support economic growth. This goes beyond the local economy, with the degree of pan-regional and national economic growth being dependent on Cambridge as a key to unlocking wider development and associated benefits.

7.15 In terms of national planning policy, Chapter 6 of the NPPF sets out the Government’s objectives for building a strong, competitive economy.

7.16 Paragraph 85 requires planning policies and decisions to help create conditions in which businesses can invest, expand and adapt. It states that:

*“...**Significant weight** should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. **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.**”*
[emphasis added]

7.17 Paragraph 86 sets out the criteria for planning policies, including the need to “pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying **suitable locations for uses such as laboratories...**” [emphasis added]

7.18 Paragraph 87 relates specifically to planning decisions, stating as follows:

*“Planning policies and decisions should **recognise and address the specific locational requirements of different sectors.** This includes making provision for:*

- a) ***clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries** (including data centres and grid connections);*
- b) *storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and*
- c) ***the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.**”* [emphasis added]

- 7.19 In accordance with the approach set out in the NPPF Chapter 6, the Development will provide an important contribution to the Cambridge cluster of knowledge, creative and high-tech industries, playing a particularly important role in the growth of the UK's life science industry, supporting economic growth and resilience. The Site provides a suitable location to meeting the needs of a modern economy, and the Application includes provision for the delivery of flexible laboratory and office floorspace in a way that will respond to the market. Accordingly, great weight should be placed on this central aspect of the Development.

Ensuring the vitality of town centres

- 7.20 The existing retail use of the Site is not protected nor restricted by any area designation or policy within the Local Plan.
- 7.21 Local Plan Policy 6 sets out the hierarchy of retail centres; the Beehive Centre is not included within the hierarchy and is 'white land' on the Policies Map. In addition, there are no further Local Plan Policies that provide protections to either retain, or require the re-provision of, the existing retail quantum, type and/or mix of retail.
- 7.22 The Development includes approximately 5,000 sqm of retail and town centre uses that will be delivered within a new local centre, which is well defined within the Parameter Plans and Design Code. The extent and composition of the local centre will promote vitality and place-making appropriate to the Site and the form of development proposed.
- 7.23 As the Site sits outside of the Council's hierarchy of centres, the sequential approach and retail impact tests have been considered – in accordance with national and local planning policies. It is agreed with the LPA that the Application has demonstrated that the Development passes these tests and would not give rise to any unacceptable impacts on local centres or the city centre.
- 7.24 The Applicant will provide evidence to demonstrate compliance with relevant Local Plan policy and Chapter 7 of the NPPF, which sets out the Government's objectives for ensuring the vitality of town centres.

Achieving well-designed places

- 7.25 It will be evidenced that the proposal is a well-designed place established through an iterative design process that has been informed by consultation and stakeholder engagement, technical assessments and ongoing review, amendment and refinement. It is a highly responsive design to the Site, the local context and the wider context. This includes consideration of Local Plan policy and the National Design Guide.
- 7.26 The design process has been undertaken as a balanced exercise to consider in the round the many aspects and factors to achieving good design, within the context of optimising the potential of the Site and the value of using suitable brownfield land for an identified need.

- 7.27 Amongst other considerations, the design was informed by townscape and visual expert input through reviewing and responding to design iterations set within viewpoint analysis; ongoing heritage assessments to avoid or minimise any conflict between the heritage asset's conservation and the proposal; a study of the boundary conditions and relationship to neighbouring properties, including sunlight-daylight-overshadowing, potential overlooking and overbearing relationships; a design approach to support a modal shift to sustainable transport modes by optimising the provision of infrastructure to support pedestrians, active travel and sustainable transport, alongside demoting the car by reference to quantum of car parking spaces and holding the parked cars in a single enclosed location close to the entrance of the Site to keep the larger part of the Site largely free of vehicular movements.
- 7.28 The Applicant's case will include expert evidence on master planning and architecture, townscape and visual impacts, matters of heritage, daylight-sunlight-overshadowing and planning, which together will give a comprehensive account of the great care and effort taken to design the scheme in a highly-considered and collaboratively way to reach the Development proposal which appropriately balances the development challenges and opportunities to optimise the potential of the Site.
- 7.29 The proposed buildings are of a greater scale than the existing retail warehouses and the proposed layout places some of these new buildings on parts of the Site that are currently under-utilised as extensive surface car parking. The proposal has optimised the potential of the Site through the re-use of suitable brownfield land and in doing so has taken care to minimise any potential negative impacts to residential neighbours. The degree of adverse residential impact does not conflict with policy but given the degree of change proposed to the Site there is some limited residual adverse impact to the amenity of some neighbouring residential properties.
- 7.30 It is a development designed for the long-term with sustainability a core part of the design ethos and approach. A purposeful intent to establish a strong sense of place that will add to local area and Cambridge and create a much-improved place from one that is currently dominated by the car and forming a poor-quality built environment. A design that embraces inclusivity to ensure that it is a place that will be welcoming to all, including for a range of community and social infrastructure provision.
- 7.31 The design approach takes the opportunity to introduce a significant new green park and separately a plaza, designed to accommodate a host of external functions and activities to be enjoyed by the public and the future employees. The layout and green infrastructure supporting a significant 100% uplift in BNG, including a dedicated ecology area, plus a tree strategy to include locations and growing space for trees of major scale to grow and thrive to their full growing potential.
- 7.32 It will be evidenced that the proposal is a well-considered new place set within a clear vision.

Consistency with the Development Plan

- 7.33 The Planning evidence will provide a detailed account for how the Development accords with the development plan when read as a whole in accordance with s.38(6) of the Planning and Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

- 7.34 There is acknowledged to be minor conflict with adopted Local Plan Policy 60 (Tall buildings and the skyline in Cambridge) as follows:
- 7.35 With respect to Policy 60, the Development is compliant with the policy apart from one element of its criterion (c). To be wholly compliant with Policy 60 a development needs to “... *clearly demonstrate that there is no adverse impact*”. There are some adverse impacts as a result of the Development at this outline application stage and therefore a technical conflict with Policy 60 exists. However, the scale of conflict with Policy 60 is considered to be minor, given:
- There are beneficial visual and townscape impacts as well as low level adverse impacts;
 - The adverse impacts that are found are within long-distant views, within which the Development will not be dominant;
 - The Development is in every other respect compliant with Policy 60 and the assessment criteria; and
 - Beyond the outline stage, at the reserved matters detailed design stages, all of the adverse impacts are either capable of being addressed or readily outweighed in the planning balance, including through adhering to the Design Code and its clear strategy to address height and scale within the detailed design stages, followed by high quality detailed design at reserved matters, all building on the clear intent of the design parameters.
- 7.36 It is noted that the Council identify a ‘slight conflict’ with Policy 67 (Committee Report, paragraph 16.26) in regard to townscape and visual effects. This will be dealt with in evidence.

Other Considerations

National Planning Policy Framework (NPPF) (The Framework)

- 7.37 The Framework has been referenced in various parts of this Statement because it represents the central governments’ planning policies and how they should be applied. The relevant sections and policies of the Framework will be evidenced where relevant to the proposal, including:
- 7.38 Section 2 – Achieving sustainable development, including Paragraph 8 to secure net gains across the economic, social and environmental sustainability objectives and Paragraph 11 providing the presumption in favour of sustainable development and the direction to approve development proposals that accord with an up-to-date development plan without delay.
- 7.39 Section 6 – Building a strong, competitive economy, including Paragraphs 85, 86 and 87 that give significant weight to the need to support economic growth and productivity, expressly including for laboratories and clusters or networks of knowledge and data-driven, creative or high technology industries.
- 7.40 Section 7 - Ensuring the vitality of town centres.
- 7.41 Section 8 – Promoting healthy and safe communities.

- 7.42 Section 9 – Promoting sustainable transport, including Paragraph 110 to focus significant development on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes
- 7.43 Section 11 – Making effective use of land, including Paragraph 125c which provides that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for identified needs and that such proposals should be approved unless substantial harm would be caused.
- 7.44 Section 12 – Achieving well-designed places, including Paragraphs 131, 135, 137 and 139 seeking the creation of high quality, beautiful and sustainable buildings and places; and that applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.
- 7.45 Section 16 – Conserving and enhancing the historic environment, including Paragraphs 212, 213, 215 and 216 to inform the assessment of harm to heritage assets and balancing any harm with public benefits.

Benefits of the Proposal

- 7.46 The Development will create a new local centre, workplace and innovation cluster, set within a high-quality landscape with significant new public open space. The Development will deliver an extensive range of benefits to secure net gains across each of the three sustainable development objectives of environmental, social and economic.
- 7.47 A table is set out below to show a summary of the benefits and their weight to be carried into the planning balance by reference to the planning benefits set out in the Planning Statement accompanying the Application. The weight that is attributed to each benefit is categorised using the following scale, which is a scale formed by the Applicant utilising the language and the inferred and relative weight in the NPPF:
- Slight
 - Limited
 - Moderate
 - Significant
 - Great
 - Substantial
- 7.48 The Applicant will provide evidence to substantiate these benefits and their weighting and to address any updates that may be required to ensure it is a matter that remains up to date for the Inquiry proceedings:

PLANNING BENEFITS		WEIGHT ATTRIBUTED
ENVIRONMENTAL		
Sustainable Development		Significant
Strategy to achieve holistic Sustainability Targets		Moderate

PLANNING BENEFITS	WEIGHT ATTRIBUTED
Ecology, including BNG and Trees	Significant
Curated Local Centre set into New Public Realm	Significant
Strategy for Improved and Greater Use of Sustainable Transport	Great
SOCIAL	
New high-quality Local Centre	Great
Local Partnerships and New Community Uses	Significant
Positive Health Impacts	Significant
ECONOMIC	
Employment and Skills Action Plan	Great
Vastly increased Economic Output (GVA)	Significant
Vastly increased Business Rates	Moderate
Contribution to the Important Life Science Cluster	Great
CUMULATIVE TOTAL	SUBSTANTIAL

- 7.49 The Development will achieve net gains across all three of the sustainability objectives of environmental, social and economic to deliver impactful benefits to the local community, Cambridge City, the wider area and nationally. Taken together as a whole, the benefits arising from the Development are of substantial weight to be placed into the planning balance.

Planning Harm

- 7.50 Through the assessment of the scheme, there are planning harms identified that are to weigh against the substantial public benefits. Evidence will be provided to explain how these harms arise and justify the level of harm identified:
- i) 'Less than substantial' harm to some designated heritage assets; (see Grounds for the Grant of Planning Permission 2.1(8));
 - ii) In regard to Townscape and Visual, the proposed redevelopment of the Site could give rise to low level harm (at the outline stage), but when "secondary mitigation" (at reserved matters stage) is incorporated, the perceived harm will be reduced to negligible or neutral, with some receptors experiencing a beneficial effect; (see Achieving well-design places Paragraphs 7.34 and 7.35); and
 - iii) Limited harm to the residential amenity of a proportionally small number of neighbouring properties (see Achieving well-designed places Paragraphs 7.28 and 7.29)).

8.0 Planning Balance

- 8.1 The planning balance for the Development is set within the context of an adopted Local Plan that is underpinned by a Spatial Strategy and Vision that sets a positive framework to support growth and with a clear recognition and support to the knowledge-based economy, while maintaining the advantages of a compact city in terms of sustainability and quality of life.
- 8.2 This is a site that the Council wants to see 'reimagined'. The Council is supportive of the principle of the Development.
- 8.3 Local Plan Policy 1 states that, when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as set out in the Framework. Planning applications that accord with Local Plan policies will be approved without delay unless material considerations indicate otherwise.
- 8.4 Local Plan Policies 2 and 40 set out a strategy of support for employment development, particularly growth of the Cambridge Cluster. The Application seeks outline planning permission for a Development that will deliver a significant quantum of office and laboratory floorspace set within a high-quality landscape and with a new extensive local centre. At the national level, there continues to be a strong Government-led imperative for the growth of Cambridge and to 'maximise the potential contribution that Greater Cambridge could make to the UK economy'. Situated in a highly accessible, edge-of-centre location, the masterplan reimagines a previously developed site in accordance with these Local Plan policies, the NPPF including its paragraphs 85 and 87 and stated Government ambition.
- 8.5 From a vehicle-dominated retail park with high traffic generation, the masterplan prioritises active and sustainable travel choices. The Development will deliver a significant shift in modal share on the Site, with both on- and off-site transport initiatives, in accordance with Local Plan Policies 5, 80, 81 and 82.
- 8.6 In accordance with the NPPF, the Development seeks to make efficient use of PDL in a sustainable location for an identified need which includes a densification of development and increased mass and building heights. This has been accomplished through a contextual and iterative approach to shape a masterplan which has resulted in a design that will deliver significant new open space and substantial new planting, including a targeted Biodiversity Net Gain of 100%. It will be a well-designed and inclusive development that will form a distinctive place in its own right. The Development accords with the objectives set out in Local Plan Policies 55, 56 and 59 and NPPF paragraph 125c.
- 8.7 The proposal will secure an outstanding design to promote a high level of sustainability and to locally raise the stand of design more generally. The Development will provide buildings that have sustainability measures integral to them, and which comply with high standards for energy and water efficiency. Acknowledging the declaration of a climate emergency, the Development will attain a range of ambitious but achievable sustainability targets, in accordance with Local Plan Policy 28.

- 8.8 In addition to providing a significant and increased number and range of job opportunities, the Development has been strongly influenced by its local community context. A range of social initiatives will be secured through the Development which will deliver substantial and tangible benefits. This directly addresses some of the most challenging characteristics within Cambridge at the present time – ensuring that growth has wide-reaching positive effects for local communities and assists in closing the poverty gap and reducing inequality.
- 8.9 The Development will deliver an extensive and impactful range of environmental, social and economic benefits, to which substantial weight is attributed within the planning balance. The Development will make a significant and positive impact.
- 8.10 On the other side of the balance must be placed any harm arising from the Development. From the extensive assessment of the Development, three residual adverse impacts are identified on the matters of townscape-and-visual impacts, heritage impacts and residential amenity.
- 8.11 Local Plan Policy 60 is the key policy consideration regarding tall buildings in relation to the Cambridge skyline. The policy does not express that a new building(s) cannot appear in the Cambridge skyline, rather it gives a policy framework within which to assess the contribution that a new building will make. A full review of the policy will be evidenced, but a key point is that *“tall building proposals must ensure that the character or appearance of Cambridge, as a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints as set out in Appendix F ... and how the proposals will deliver a high quality addition to the Cambridge skyline”*.
- 8.12 While the Townscape and Visual Impact Assessment (TVIA) finds an adverse effect to the skyline at the outline stage, the Development has been designed purposefully to respond to the townscape analysis and the Cambridge skyline and create a form of development that will contribute to the skyline but will not dominate it, especially as it sits at some distance from the assessed viewpoints, wherein a wider appreciation of the city can be taken and to readily see the retained dominance of spires and towers emerging above the established tree line. The Design Code clearly expresses a design intent for a high-quality development of exceptional architectural quality. In this regard, the Development is poised to positively add to the evolution of the city and the strong presence of research and development, in its many forms, within the history of Cambridge once the scheme has progressed through the reserved matters stages.
- 8.13 Whilst the new buildings will be partly seen they will be highly designed to be respectful and to become a high-quality addition to Cambridge. The identified adverse impacts at the outline stage are expected to diminish through the achievement of a high-quality architectural response at reserved matters stage.
- 8.14 In summary on townscape and visual, the proposed redevelopment of the Site could give rise to low level harm (at the outline stage), but when “secondary mitigation” (at reserved matters stage) is incorporated, the perceived harm will be reduced to negligible or neutral, with some receptors experiencing a beneficial effect.

- 8.15 With respect to designated heritage assets, the Development will lead to some beneficial and some minor to minor/moderate adverse impacts on the significance of some heritage assets. The design evolution for the scheme has included for masterplan and parameter plan changes that minimise the impact on the Development on the significance of heritage assets. The adverse impacts that are found through the heritage assessment are all considered to represent “less than substantial” harm in the context of paragraph 215 of the NPPF.
- 8.16 Paragraph 215 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of designated heritage assets, this harm should be weighed against the public benefits of the proposal. Likewise, Local Plan Policy 61 reflects the approach set out in the Framework, with Policy 61 criteria (e) requiring clear justification for any works that would lead to harm or substantial harm to a heritage asset yet be of “*substantial public benefit*” through detailed analysis of the asset and the proposal.
- 8.17 In relation to non-designated assets, such as locally-listed Buildings of Local Interest (BLI) in Cambridge, paragraph 216 of the NPPF requires a local planning authority to make a “*balanced judgement*” having regard to the scale of any harm or loss and the significance of the heritage asset. Likewise, Local Plan Policy 62 states that where an application for works would lead to harm or substantial harm to a non-designated heritage asset, a balanced judgement will be made having regard to the scale of any harm or loss and the significance of the heritage asset.
- 8.18 The balancing exercise required via heritage policy has been carried out through the context of a holistic view of the Development Plan. The “less than substantial” harm identified to the significance of some heritage assets has been found to be clearly outweighed by the substantial public benefits to be delivered by the scheme. In addition, it is expected that the identified less than substantial harm at the outline stage will reduce through the use of high-quality design at the reserved matters stages.
- 8.19 The proposed buildings are of a greater scale than the existing retail warehouses and the proposed layout places some of these new buildings on parts of the Site that are currently under-utilised as extensive surface car parking. The design of the masterplan and the ten proposed principal buildings have been formed through a contextual, informed, responsive and iterative design process that seeks to balance a host of design considerations, including for the relationship and impact to residential neighbours. The proposal has optimised the potential of the site through the re-use of suitable brownfield land and in doing so has taken care to minimise any potential negative impacts to residential neighbours. The degree of adverse residential impact does not conflict with policy but given the degree of change proposed to the Site there is some limited residual adverse impact to the amenity of some neighbouring residential properties.
- 8.20 In summary on policy, there is one minor conflict with Policy 60, but the Development is nevertheless compliant with the Development Plan when read as a whole.
- 8.21 The public benefits arising from the Development – environmental, social and economic – will be evidenced to be of substantial weight and collectively are considered to clearly outweigh the harm identified to heritage significance (less than substantial), townscape and visual (low level harm) and residential amenity (limited harm).

9.0 Conclusion

- 9.1 The Development accords with an up-to-date development plan, when read as a whole, and therefore benefits from the 'presumption in favour of sustainable development' set out in Government policy and reinforced in the adopted Local Plan (Policy 1). The public benefits clearly outweigh any harm arising from the proposal.
- 9.2 The Applicant intends to submit evidence to present the positive case for this Development and to respond to any matters raised by the LPA or third parties in response to this Statement of Case, or where Government advice and matters of planning policy are updated in so far as relevant to the Development.
- 9.3 Expert evidence will be called in respect of the following matters, where it is considered relevant to the Secretary of State and Inspector's considerations: masterplanning and architecture; heritage; townscape and visual; sunlight and daylight; socio-economic benefits; and planning.
- 9.4 The Applicant proposes to enter into a Section 106 obligation to ensure that the appropriate planning obligations for the application scheme can be secured by the LPA.
- 9.5 A list of draft Planning Conditions will be discussed and agreed with the LPA and will be included within the final Statement of Common Ground (SoCG).

