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Carter Jonas

By email only

13 November 2020

Proposal: BTR, apart-hotel and mixed use scheme
At: NIAB Headquarters, Huntingdon Road, Cambridge CB3 0LE
Reference: 20/51203/PREAPP

Dear [REDACTED],

This letter provides a summary of our discussion on 24 September and forms the local planning authority's formal written response. The letter should be read in conjunction with our previous advice. The following documents were reviewed:

- Pre-Application Meeting 4 September 2020

I have provided our response in the updated the issues log appended to this letter, which should form the basis of pre-application discussions going forward. **You must provide a response to each matter in the form of an updated issues log with all future pre-application submissions, so that progress can be made on all matters.**

SUMMARY

Officers recognise that significant changes have been made during the course of our pre-application discussions, including the retention of the BLI and the substantial reduction in the intensity of development proposed. The proposed site layout and buildings have evolved in a way which is more sensitive to the surrounding character and to the properties which neighbour the site. The changes that have been made to the southernmost block through the introduction of pitched roof forms which relate better to the BLI has been positive, and officers support the ongoing design development of the forms and elevations.

However, officers remain very concerned that important technical assessment which underpins the scheme has not been progressed and this must be addressed so that it can inform the scheme's development and must be agreed with consultees before a planning application is submitted. Failure to resolve technical issues such as drainage at pre-application stage is likely to result in delays in the determination of any subsequent planning application. The issues log

must be responded to in full in the next pre-application submission, however I highlight the following significant matters of concern:

1. Sustainability and comfort – more assessment needs to be provided for more of the homes and to layer the other environmental factors, such as noise and ventilation conditions. See detailed comments within the issues log.
2. Scale and massing – the location of visualisations along Lawrence Weaver Road and other key points around the site need to be agreed and these need to be produced so that the perceived scale and massing of the development can be assessed. This must inform the scheme's development and the scale / massing may need to be altered in response.
3. Sustainable drainage – a flood risk assessment and detailed sustainable drainage strategy needs to be provided so that the drainage proposals can be agreed and this can inform the landscaping proposals. This is now a critical piece of work which undermines the landscaping strategy and must be provided in the next submission.
4. Open space and play strategy – based on the information available, the onsite open space provision is below the adopted standards for informal open space and provision for children/teenagers. This is unacceptable and no convincing case has been made to demonstrate that the proposal meets the policy requirements. See detailed comments below.
5. Affordable housing delivery – we need to agree an approach to affordable housing delivery onsite, including the amount and mix of provision, the affordability of rent, and the eligibility, as well as mechanisms to secure affordable housing in perpetuity through the S106 Agreement. A meeting with the Housing Strategy Manager has been arranged and feedback will be provided separately.
6. Mixed use – more information is needed on the mixed-use elements, including the microbrewery, cycle café/workshop in terms of the proposed use classes, and operational and environmental health issues, so that these can be assessed and mitigated as necessary.
7. Elevations and roof form – more work needs to be done to test options for the roof forms, in particular to reduce the bulk of the flat-roof elements of the southernmost block closest to the BLI. Much more design development is needed on the elevations based on the feedback provided in our last letter regarding the hierarchy of buildings and elevations.
8. Parking – the ratio of car parking for each use needs to be justified in relation to the adopted car parking standards and a transport assessment agreed by the Highways Authority. Please update us on your discussions with the Highways Authority so that it can inform the number and allocation of car parking spaces.
9. Cycle parking – the proposals need to resolve the cycle parking so that provision is made at ground-level and not within the basement.
10. S106 Agreement – consultation will be required with the County Highways Authority, education team and other consultees for non-financial obligations and financial contributions. This should be progressed prior to submission of the planning application

for a scheme of this size. Please provide draft Heads of Terms so that this can be progressed.

PROGRAMME

This letter does not include feedback on changes made prior to the Quality Panel presentation on 29th October, or incorporate any reference to the panel discussion. It is important that the next pre-application submission addresses the panel's comments, in addition to the issues log.

I have recommended that the scheme is presented to the Joint Development Control Committee (JDCC) at pre-application stage via a developer-led briefing, and this has been arranged for 18th November. As noted below, no timescales have been provided for your public consultation programme, however I would expect a committee briefing to fit with this.

I understand that you intend to submit your application in early 2021, and I would strongly advise you to only submit an application once there is broad agreement from officers on the main issues. Based on the issues log below and as highlighted above, there are substantial issues that require further discussion at this stage, partly as significant technical work needs to be reviewed.

I envisage at least two further design review meetings are required to review the changes following this feedback and the Quality Panel, the JDCC briefing, and additional specialist meetings / discussions should be arranged. This includes with housing and policy colleagues, drainage, sustainability and environmental health.

This letter provides informal officer views and it does not therefore bind the decision of Members of the Council's Joint Development Control Committee when the application(s) is (are) formally determined in due course.

If you have any questions on the above, then please do not hesitate to contact me.

Yours sincerely,

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Enclosures: Issues log

Issues log 13.11.2020

Issue	LPA Comments	Status
A.	Principle of Development	
Principle of development	<p>The rear part of the site forms part of the site allocation R43 in the Cambridge Local Plan (CLP) 2018. This is within the land between Huntingdon Road and Histon Road Area of Major Change allocated for a mix of residential properties and other complementary uses necessary for the creation of a sustainable and vibrant community under CLP policy 20. The principle of residential development on this part of the site is acceptable.</p> <p>The existing NIAB buildings are outside the site allocation. CLP 2018 policy 41 gives a presumption against the loss of employment uses, including B Use Classes and sui generis research institutes. Marketing will need to be evidenced in accordance with Appendix K of the Local Plan in order to meet the policy requirements.</p> <p>The proposed change of use to apart-hotel will need to be assessed against CLP 2018 policy 77 which supports proposals for high quality visitor accommodation beyond the City Centre in North West Cambridge, located on the frontages of main roads or in areas of mixed-use or within walking distance of bus route corridors with good public transport accessibility.</p> <p>A policy briefing note is required to evidence how these policies will be met, to be discussed with the Policy Team.</p>	RED
Coordinated development	<p>The proposal will need to ensure compatibility with nearby developments and planned developments, namely Darwin Green and Eddington so that it does not negatively impact on the sustainability and vibrancy of these communities in accordance with CLP 2018 policy 20. In particular, the housing mix and intensity of development should be compatible with the developing communities, and any complementary uses should seek to enhance rather than compete with commercial or community facilities within the developing local centres.</p> <p>The proposal includes a gym, microbrewery, cycle workshop/cafe and co-working spaces around the civic open space. More consideration needs to be given to how this relates to the Darwin Green local centre to ensure the use, size and location of these are complementary and appropriate, which needs to be discussed with Policy Officers. From an urban design perspective, consideration should be given to locating the active uses closer to the Lawrence Weaver Road frontage to active this main road into Darwin Green, rather than pulling users and passers-by into the site and away from the local centre.</p>	RED

B.	Housing Delivery	
Affordable Housing	Commitment has been made to provide affordable housing within the residential component of the scheme. Further discussions are required with the Housing Strategy team on the affordable housing proposals, having regard to the CLP 2018, the NPPF (2018) and other material considerations. The proportion of affordable housing, their affordability and delivery need to be agreed, and the homes should be tenure blind and distributed appropriately. This is in the process of being arranged.	RED
Housing mix	CLP 2018 policy 45 requires developments to provide a balanced mix of dwelling sizes to meet the projected future needs within Cambridge for different unit sizes of affordable housing and market housing. Limited information has been provided on dwelling sizes. This needs to be provided for both the affordable and market housing, to be discussed with the Housing Strategy team.	RED
Housing standards	Commitment has been made to meet the adopted internal space standards within CLP 2018 policy 50, which is welcomed. The illustrative floor plans show the standards would be met, however no detailed internal floor plans have been provided.	AMBER
Residential amenity	<p>In addition to the housing standards, the dwellings should provide a high standard of living accommodation for the future occupants. Environmental issues that would impact on the living environment should be assessed at an early stage so that mitigation can be designed into the architectural response. This includes solar gain, over-heating, daylighting, air circulation and noise. See comments on sustainability and comfort below, which must be addressed.</p> <p>Private external amenity space should be provided sufficient to meet the day-to-day needs of the future occupants in accordance with CLP 2018 policy 50. Commitment has been made to provide private amenity space for each dwelling and illustrative floor plans show balconies large enough to accommodate a table and chairs, however no detailed floor plans have been provided. The ground floor dwellings need to have private and defensible amenity space, which may impact on the open space provision and landscaping proposals. This needs to be shown on a scaled site plan.</p> <p>Shadow studies need to be provided to assess the impact of the proposed buildings on the surrounding Darwin Green plots. A scaled plan needs to be provided so that building separation distances can be measured and overbearing/overlooking can be assessed.</p>	RED
Accessible Homes	CLP 2018 policy 51 requires all housing development to be of a size, configuration and internal layout to enable Building Regulations requirement M4 (2) 'accessible and adaptable dwellings' to be met, and 5 per cent of the affordable housing	RED

	component to meet Building Regulations requirement M4 (3) 'wheelchair user dwellings' to be wheelchair accessible, or be easily adapted for residents who are wheelchair users. A commitment to meeting these requirements needs to be provided.	
C.	Spatial Principles and Response to Context	
Access and movement	More assessment is required to show how residents and visitors would move from the main arrival points to key destinations, including front doors, car/cycle parking, and facilities such as concierge and bins. This should consider different users, modes of transport and times of day/year.	RED
Block structure	The rationale for the block structure is understood, however concerns regarding access and movement, open space provision, the quality of open spaces, and comfort/cooling need to be addressed (see below), which may affect the block structure.	RED
Open space and green infrastructure	<p>The amount of public and private open space needs to be assessed against the adopted open space requirements in the CLP 2018 policy 68 and the Open Space and Recreation Strategy. In the email from Colin Brown dated 19/10/2020, the current scheme proposed 0.79Ha open space for the BtR element of the scheme. Please provide a plan showing the areas that have been included in this calculation to show the usability of this area.</p> <p>You calculate that the latest housing mix for the 297 units proposed would generate a total of 431 persons. Please provide a breakdown of the housing mix, so that we can agree the calculation and the number of occupants. Based on this, you state that applying the standards would require provision of:</p> <ul style="list-style-type: none"> • Outdoor Sports – 0.49Ha • Provision for C & T – 0.12Ha • Informal Open Space – 0.91Ha • Allotments – 0.17Ha <p>You state that when this is compared to the policy requirement for Informal Open Space, 87% of full provision would be made on site. If you also include the children and teenagers' requirements, this would equate to on-site provision of 77%. This is below the standards and therefore an under-provision. Under CLP 2018 policy 68, alternative provision off-site of open space may be acceptable only in specific circumstances, and no convincing case has been made yet to meet these criteria. Therefore the open space provision is currently unacceptable.</p> <p>A play strategy needs to be provided in accordance with the requirements in the CLP 2018 policy 68 and the Open Space and Recreation Strategy. This must be informed by a population projection for the number of children, which should be based on the calculations within the Open Space and Recreation Strategy. The email from Colin Brown dated 19/10/2020 states that it</p>	RED

	<p>is unlikely that the development will be inhabited by a large number of children/ teenagers, however no evidence has been submitted to demonstrate this. The play strategy needs to include the distances from front doors to the play facilities.</p> <p>You should consider the natural surveillance of the open/play spaces and the noise/disturbance impact of play areas within confined spaces on residential amenity.</p>	
Heights and massing	<p>Concerns remain about the proposed heights and massing as shown on the sections and the townscape visualisations in terms of how it relates to the surrounding. The location of visualisations needs to be agreed and these need to be produced so that the perceived height of the development can be assessed. This must inform the scheme's development and the scale and massing may need to be altered in response.</p>	RED
BLI	<p>The proposal to demolish the 1960s extension and for a detached southernmost block is supported in principle, however more information needs to be provided about the restoration of the BLI where the existing link elements attach. This detail should be provided in the planning application and discussed with the Conservation Officer during our pre-application discussions. The Conservation Officer supports the intention to appoint JTP architects to handle the 'making good' of the BLI following the demolition of the links, should this happen.</p>	AMBER
Response to context	<p><u>Apart-hotel block</u></p> <p>The asymmetric gable ends and links to the flat-roof volume behind are very unsatisfactory. The Conservation Officer recommends that as the more-or-less H-plan proposed turns the corners from the pitched roof blocks parallel to Howe's Place & LW Road into the flat roof element at right angles [directly behind NIAB] it needs something like pitched roof gables running into the ridges with proper valley junctions to read more coherently [this would work at the Northern end of the H-legs too]. The flat-roofed element then needs a much more imaginative parapet design – to North & South – to get away from any sense of 'box-piled-on-box'. Perhaps with a curved coping or something taking cues from NIAB but reinterpreting them [doorcases, for example].</p> <p><u>Howes Place</u></p> <p>The pitched roof design seems very 'tokenistic' and officers are sceptical how this can integrate large areas of flat roof into a coherent scheme for each building.</p> <p><u>Mews</u></p> <p>The concept of a mews is supported in layout terms, however a cross-section is required to show the relative heights and distances for the houses already under construction in BDW1 (Darwin Green). The flat-roofed blocks will poorly integrate with the pitched roof forms of Darwin Green and it should be remembered that this NIAB site is not to be seen in isolation and</p>	RED

	<p>divorced from its current or forthcoming – off site – surroundings. You should test whether pitched – or other – roof forms would be more appropriate in this location.</p> <p><u>Lawrence Weaver Road</u></p> <p>The Conservation Officer remains opposed to the flat roof forms on this frontage and urges you to consider whether more varied roof forms could be incorporated.</p>	
Architectural treatment (elevations, materials)	<p><u>Apart-hotel</u></p> <p>The delineation of heights using the ‘horizontal slicing’ diagram (pages 32 to 34) should be used to inform the design choices on floor-to-ceiling heights, the relationship of walling to roofing, and the perceived heights of eaves & ridge. The pitched roof blocks of the ‘aparthotel’ are losing the delineation between roof and wall [shown as a red dotted line] because, in some areas, the dormers cutting through the eaves – which is a normal thing to do – then form part of elongated bays descending to the ground. The success, or otherwise, of this feature depends on detailed design and choice of materials, but the double-width examples seem to overwhelm the necessary clear distinction between roof and wall.</p> <p><u>General comment</u></p> <p>The comments made previously about the hierarchy of buildings along Lawrence Weaver Road, the hierarchy of the elevations, and the architectural detailing need to be addressed through a further iteration of detailed design development, which should be informed by the work on comfort/cooling and the integration of mitigation measures through the architecture. More information on materials palette is required.</p>	RED
Landscape	<p>More assessment is needed on the quality of the open spaces, including the sense of privacy, over-looking, natural surveillance and sense of security. Scaled or dimensioned plans / sections must be provided so that the height to width ratio of the open spaces between the blocks can be assessed. The distinction between public and private spaces needs to be clear in the landscaping.</p>	RED
Public Art	<p>CLP 2018 policies 56 and 59 promote the integration of public art into proposals. A Public Art Strategy should be provided for review.</p>	RED
D.	Transport / Highways	
Transport impact	<p>The transport assessment should be agreed by the Highways Authority early on in the process, as this will be an important aspect of the proposal. Please provide an update on discussion with the Highways Authority.</p>	RED

Car and cycle parking	<p>Car and cycle parking provision should be informed by the transport assessment to be agreed by the Highways Authority. Information on car and cycle parking should be provided with reference to the adopted car and cycle parking standards in the CLP 2018 policies 80, 81 and 82.</p> <p>Car parking should be minimised due to the site's highly sustainable location. Basement car storage is supported in principle; however the parking numbers should be agreed early on as it will inform the site layout.</p> <p>Cycle parking should be high quality, easy to use and inclusive. Reference should be made to the Cycle Parking Guide for New Residential Developments SPD (2010). All cycle parking should be provided at ground level and within the footprint of the buildings who's residents it serves. Cycle parking within the basement will not be supported.</p> <p>Taxi drop-off and servicing to the residential use and the apart-hotel needs to provided within the site to avoid cars stopping on Huntingdon Road and Lawrence Weaver Road. This should be integrated into the site layout and landscaping.</p>	RED
Highway access	<p>Vehicular, pedestrian and cycle access needs to be discussed with the Highways Authority, having regard to the need to prioritise pedestrian and cycle access. CLP 2018 policy 20 supports development that provides walking, cycling, and improvements for disabled people (accessible for all) on- and off-site to offer more sustainable travel choices for residents.</p>	RED
E.	Environmental issues	
Sustainability	<p>The proposal must demonstrate compliance with CLP 2018 policy 28 relating to carbon reduction, community energy networks, sustainable design and construction, and water use, which states that all development should take the available opportunities to integrate the principles of sustainable design and construction into the design of proposals. You will need to submit a Sustainability Statement outlining the approach to adaptation to climate change, carbon reduction, water management, site waste management and use of materials. This should demonstrate the approach to meet the targets relating to onsite reduction of carbon emissions and water efficiency for new dwellings, and BREEAM 'excellent' for the apart-hotel. The statement should be prepared with reference to the Greater Cambridge Sustainable Design and Construction SPD 2020.</p> <p>The latest proposal continues to include deep-plan blocks and the internal floor plans show double-banked corridors. The presentation included more information on the ratio of single and dual aspect dwellings, showing that in the current proposal 64% of dwellings would be dual or triple aspect, however that a proportion of the single aspect dwellings would be north</p>	RED

	<p>facing. The number of single aspect flats should be minimised as much as possible through amendments to the floor plans and consideration of duplexes.</p> <p>The presentation included a limited assessment of overheating, solar gain and daylighting, which was welcomed, however further assessment is required. The Sustainability Officer is generally happy with the initial direction of travel in relation to considering the issue of overheating, but recommends as well as choosing units for overheating analysis based on solar exposure, you should also layer onto this constraints such as noise exposure and safety considerations.</p> <p>You should include testing ground floor units (single and dual aspect) as well as a dual aspect on the corner of Lawrence Weaver Road, as there may be some noise constraints here that could limit the use of natural ventilation, as well as security considerations for ground floor flats, which could impact on the cumulative approach to mitigation, the last stage of which is medium levels of thermal mass with night ventilation. You may need to consider acoustically attenuated louvre vents in these locations as well as external shading. This is also where the Good Homes Alliance overheating toolkit could help, as this is a really simple to use assessment of risk before going on to the more detailed CIBSE analysis and could be submitted as part of the planning application.</p> <p>It is important that solar gain, over-heating, daylighting and air circulation are considered early on so that architectural responses to environmental issues can be designed into the scheme and the Sustainability Officer and Urban Designer would support an approach which considered the role of mitigation measures in providing some architectural expression/articulation to the scheme. Any mitigation measures need to be clearly shown on elevation drawings. It is likely that some external shading to Lawrence Weaver Road elevations with possibly both horizontal and vertical to areas of glazing that are currently unshaded (and possibly acoustically attenuated louvre vents to provide natural ventilation). Louvre vents at ground floor would also enable the secure night-time ventilation needed for night purge.</p> <p>Where single aspect north facing flats are unavoidable, you need to think about your approach to maximising approach to daylighting, for example an increased glazing height at ground floor, with the height then gradually reducing as you go up a storey.</p> <p>Please also provide further detail on other aspects of sustainability such as energy and meeting the BREEAM requirements for the aparthotel. A draft Sustainability Statement should be provided for review and a separate meeting arranged to discuss this at a later date.</p>	
Drainage	<p>The drainage strategy must follow the drainage hierarchy, must comply with CLP 2018 policies 31 and 32, and the Cambridgeshire flood and water SPD and advice for developers that you can find in the following link, published in LLFA website: https://www.cambridgeshire.gov.uk/business/planning-and-development/flood-and-water/surface-water-and-sustainable-drainage-systems-suds-planning.</p>	RED

	<p>The drainage strategy presented remains at high level and more detail needs to be provided. The LLFA should be consulted prior to submission.</p> <p>Notwithstanding this, while the sustainable drainage engineer supports the proposed use of green roofs, soft landscape, biodiversity water gardens, rainwater harvesting in principle, more detail should be provided how the drainage features will be integrated around the site and with the other demands on the open space. The current plans only show a swale.</p> <p>A Flood Risk Assessment is required as the proposal is for major development. This will need to include an assessment of all sources of flooding. The proposed basement is of particular importance and the FRA will need to include details of the measures to protect the proposed development from groundwater flood risk and from increasing the groundwater flood risk elsewhere through ground water displacement.</p>	
Trees	<p>There are individual and group tree protection orders covering the trees along the Huntingdon Road, Lawrence Weaver Road and Howes Place frontages and within the site. A tree survey should be provided so that the impact of the proposals on the protected trees can be assessed in accordance with CLP 2018 policy 71.</p>	RED
Ecology	<p>An ecological survey should be provided to assess the presence of protected species on the site. The proposals should demonstrate compliance with CLP 2018 policy 70 relating to the protection of priority species and habitats. The proposal should also deliver biodiversity net gain and calculations for this must be provided.</p>	RED
Environmental Health issues	<p>Air quality, noise and ventilation issues need to be discussed with the Environmental Health team early on, as these have implications for sustainability and the quality of the accommodation, which need to be designed into the scheme as it develops.</p>	RED
Refuse and recycling	<p>More information on the proposed underground refuse and recycling collection serving the BTR homes needs to be provided, in terms of volumes, distances from homes to collection point, collection and management arrangements, and vehicle turning heads. Unless a private management arrangement, this must be discussed with the Greater Cambridge Shared Waste Service prior to submission to ensure that the correct vehicles are available and have been used in assumptions. This is critical because an alternative, more conventional arrangement would have significant implications which would need to be designed into the scheme.</p> <p>More information is needed on the proposed collection store serving the apart-hotel, in terms of the bin and store capacities, distances from homes to collection point, the drag distances from the bin store to the collection store, and the drag distance from the store to the kerbside.</p> <p>For both, reference should be made to the RECAP Waste Management Design Guide SPD 2012.</p>	

F.	Stakeholder Engagement	
Stakeholder Engagement	<p>The Stakeholder Engagement Strategy's approach to online consultation necessitated by the pandemic and current government restrictions is supported in principle, however the strategy should be updated to reflect the following comments please:</p> <ul style="list-style-type: none"> • No timetable has been provided to show consultation would be done at the appropriate time in the scheme development and with enough time for the scheme to respond to the consultation feedback. Please provide a timetable for review. • The briefing to Ward Councillors in preparation for the public consultation is important. As well as the City Councillors, you should include the County Councillor for Castle Ward, Cllr Richards, in your targeted consultation. • The strategy needs to identify key stakeholder groups that will be targeted through the consultation, including residents groups and key campaign groups, in particular Camcycle. Please update the strategy to identify those key groups and how they will be engaged. • The strategy should include reference to participation in the North West Community Development Forum, which is currently operating virtually (more information here: https://www.cambridge.gov.uk/north-west-and-west-community-forum). The forum is arranged by ██████████ in the Council's growth team ██████████ and please make contact with Julian to liaise over the upcoming dates. • The website should allow comments to be submitted at any time and not just within the publicised two-week consultation period, to allow as much feedback to be received as possible. • The website should publish the applicant's response to the consultation feedback so that it is transparent to residents how their comments have been taken into account. This should be published prior to (or at the very least, concurrently with) submission of the planning application. • The website could be a useful tool beyond the planning stage (if planning permission is granted) to continue to engage with local residents during the construction and, potential, beyond to occupation/operation. • The strategy should include a pre-application briefing to Members of the Joint Development Control Committee, as the planning application is likely to be determined by committee. This should be included on your timetable and should be scheduled to allow sufficient time for the scheme to respond to the feedback. 	AMBER

G.	Environmental Impact Assessment	
Environmental impacts	The requirements for screening for Environmental Impact Assessment are set out in regulation 9 and regulation 10 of the 2017 Regulations and need to be addressed.	RED
H.	S106 Agreement	
Non-financial obligations	Please provide Heads of Terms, including contributions requested by the Highways Authority. Onsite delivery of affordable housing will need to be included in the S106 Agreement, the terms of which should be discussed prior to submission.	RED
Financial contributions	Please provide Heads of Terms, including contributions requested by the Highways Authority. Please provide the housing mix, so that a population projection can be made on which to assess contributions towards offsite infrastructure. Consultation will be required with the County education team and other consultees. This should be progressed prior to submission of the planning application for a scheme of this size,	RED