

## Natural Environment

### Landscape Consultation Response

Reference Number:	22/02771/OUT
Proposal:	<p>A hybrid planning application for:</p> <ol style="list-style-type: none"> <li>1) An <u>outline</u> application (all matters reserved apart from access and landscaping) for the construction of: <ol style="list-style-type: none"> <li>a) <u>three new residential blocks</u> providing for up to 425 residential units and providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii));</li> <li>b) and <u>two commercial buildings</u> for Use Classes E(g) i(offices), ii (research and development) providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), together with the construction of basements for parking and building services, car and cycle parking and infrastructure works.</li> </ol> </li> <li>2) A <u>full</u> application for the construction of <u>three commercial buildings</u> for Use Classes E(g) i (offices) ii (research and development), providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)) with associated car and cycle parking, the construction of a multi storey car and cycle park building, together with the construction of basements for parking and building services, car and cycle parking and associated landscaping, infrastructure works and demolition of existing structures.</li> </ol>
Site Address:	Land North of Cambridge North Station Milton Avenue Cambridge Cambridgeshire
Case Officer:	Fiona Bradley
Responding Officer:	Bana Elzein
Date:	15 Dec 2022

Documents reviewed:

Application documents: Landscape and Open Space Strategy, Design and Access Statement, Parameter Plans; LVIA and Appendix 12 of EIA document; Landscape Masterplan and other Landscape drawings;

Other documents: NECAPP LCVIA

(<https://www.greatercambridgeplanning.org/emerging-plans-and-guidance/north-east-cambridge-area-action-plan/north-east-cambridge-aap-document-library/>)

### **Comments:**

*Updated comments have been included in italics as responses to the updated and amended documents.*

## **OUTLINE PROPOSALS**

### **Parameter Plans**

- Parameter Plan 01 – Existing Site Conditions
  - Identification of existing mitigation mosaic landscape area is required.
- Parameter Plan 02 – Building Layout and Application Type
  - We query whether submitting the detailed proposals for the residential external spaces and POS is ideal. Areas where the externals interact with the Outline building proposals may prove to be difficult to finalise and may ultimately require becoming subject to S73 applications to alter them.
- Parameter Plan 3 – Maximum Building Area – Basements
  - In general, Landscape has concerns about how extensive the impacts of the basements, which exceed the extents of the building envelope, will affect the areas of trees and landscape. Further details with respect of this follow in more detailed areas.
- Parameter Plan 4 and 5 – Maximum Building Areas – Ground Floors and Typical Levels
  - Landscape has no detailed comments to make about these parameter Plans
- Parameter Plan 6 – Building Heights Plan
  - Landscape has considerable concerns with this set of parameters and more detailed comments about Building Heights is made below:
  - The following comments are based on a review of Parameter Plan 6 and the Scale and Storey Height Diagrams on page 107-110 of the Design and Access Statement. The Draft NECAAP Heights diagrams is based on storeys but has provided an assumption which allows a height in meters to be calculated. It must be noted that the

AAP assumes all heights are *inclusive* of plant. The heights and stories represented on page 107 are all '+ plant' while the Parameter Plan is inclusive of plant. What is also critical to note is that the maximum heights in the AAP are for Landmark buildings. Not all the buildings can be landmarks and the majority must be more modest buildings. It is envisaged that the typical heights should be achieved for most buildings with clear landmark statements emerging at key vistas, corners or other areas of note.

- S4 - One Milton Avenue is proposed to be 5m higher than the maximum landmark building guidance at highest point.
- S5 – Transport Hub in compliance
- S6 & S7 – highest point exceeds 22m, maximum landmark building height, identified in AAP by 0.1m to top of plant screen.
- S8 – highest point exceeds 22m, maximum landmark building height, identified in AAP by 2m.
- S9 – highest point exceeds 22m, maximum landmark building height, identified in AAP by 4m.
- S11-S21 – Residential – Heights vary throughout, and the buildings are in two distinct AAP zones. One which faces onto the Busway with a max landmark building height of 25m and one which faces onto Milton Avenue which is given in max storeys only of 5 storeys which is equivalent to 16m. The only parts of the residential section in compliance are usually the lower linking buildings, but even these are not all in compliance. Overall, the residential development must seek to be lower in overall height to reduce impact on nearby typical suburban residential properties, the closest of which are bungalow houses on Discovery Way.
- Throughout the pre-application process, due to the scale of the development, the preparation of an LVIA and the testing of agreed viewpoints was considered by officers to be critical to the design of the development, particularly in relation to scale, mass and height. This was repeated throughout the pre-app process, but the LVIA was delayed and could not be used as an effective design tool. As a result, it is considered that much of the development exceeds acceptable limits. The visualisations also provide insight to the mass and scale assessments.
- Parameter Plan 7 – Ground Floor Uses

- Landscape is satisfied that most other frontages will be active though there are questions regarding the ground floor frontages both inward and outward looking for the residential quadrant.
- APParameter Plan 8 – Access Plan
  - 18 Cycle access points are identified within the plans but only 9 are located off a cycle or vehicular route. It is considered that the remainder may suffer from conflict with pedestrians. It would be preferable for cycle access points to be well located, legible and not relegated to a rear aspect wherever possible.
- Parameter Plan 9 – Landscape and Open Spaces Plan
  - Open space requirements for residential uses are discussed later within more detailed Landscape commentary.

### **Landscape and Open Space Proposals**

A large amount of detail has been provided at Outline for the residential portion of the site. The comments below would apply to detailed/reserved matters discussions it is assumed but has been provided here for fullness of response.

- Open Space Provision
  - Informal Open Space - It is considered that the 'Wild Park' is not there for the benefit of the residential development but rather the wider area as a whole. In terms of informal open space provision, Chesterton Gardens appears to provide enough to satisfy the requirements of the residential development and thus there are no objections to the allocation.
  - Childrens informal play- It is unclear whether the informal children's play space has been double counted with the Informal Open Space areas as they are ringed in the dashed line but also coloured yellow (Page 35 of the Landscape Strategy)
    - *Amended comments: Clarity has been provided regarding the counting of the Informal Open Space and is acceptable.*
  - Childrens formal Play – The Equipped play areas proposed within the Wild Park are not clear. Introducing play in this area seems in conflict with the use of the area as a mitigation for lost mosaic habitat and biodiversity.

- Community Growing – The proposals rely on meanwhile uses to achieve the appropriate balance of accessible and public growing space, which is considered unacceptable. Ultimately, over 75% of the provision comes from meanwhile use, while nearly 20% is provided on private roof areas. None of these types of areas can be entitled allotments as they will not have public accessibility and statutory protection which allotments enjoy. It is considered that more public provision of allotment space must be considered for this site to achieve a successful balance of required Open Space Provision.
  - *Amended comments: An area of allotments have been provided along the eastern boundary previously attributed to ‘Wild Park’ which is welcome. Very little information has been considered including spatial requirements and management/adoption. In terms of Area, it is considered that the access road should not be counted towards the allocation.*
  - *Amended comments: The removal of reliance on the raised bed planters within the meanwhile site for community growing is welcome, though their retention retains all the same concerns about maintenance, watering and ‘ownership’ It’s not clear how long the raised beds would be in place for or whether their presence would coincide with a planting season or seasons.*
- Overall, the residential development is likely under providing on all but informal open space, which we do not find acceptable.
  - *Amended comments: The response bases the current proposals as not having enough room to adequately provide play space which is appropriate to the character of the area as well as in compliance with distance requirements of LAPs/LEAPs etc. which furthers the consideration of overdevelopment of the proposals*
- Wild Park – this space had not been discussed at any pre-application meetings. It is unclear what purpose the park provides to the overall development. The proposals are for the creation of Open Mosaic Habitat across a large area as well as the introduction of a wetland/pond. We question then, the appropriateness of also layering children's play into the

area at this point. There is concern over the lack of overlooking of the area and the poor accessibility from the residential development. Overall, it is felt that an important facet of forward masterplanning has been lost for what might eventually become an urban park.

- Chesterton Gardens – Overall the proposed external spaces associated with the residential development are acceptable in design terms, however, the previous comments on Open Space consider that there is not enough space for the size development. Not enough detail has been provided to determine the acceptability of the external spaces in relation to the Outline with all matters reserved except Access and Landscape.
- Cowley Road circus – Landscape has concerns and reservations about the design of the road, cycle and pedestrian routes in this area. Pedestrian routes are not direct, vehicular routes are very risky in so far as a low order street is joining Cowley Road within centimetres of a much more major junction. Cycle routing is not identified at all despite there being cycle parking access points which front onto the Cowley Road extension. The current pattern puts cyclists at risk by creating a crossing situation at a significant curve in the primary street and having to negotiate the confluence of up to 7 vehicular traffic movements. Throughout the pre-application process it was found that this junction would be an ideal location for a ‘Landmark.’ It is considered that the submitted information shows that this space is still struggling with legibility, place and identity.
  - *Amended comments: changes have been made which aid in the legibility of this space for pedestrians crossing from the residential block to the Park, but the other concerns remain.*
- Chesterton Square – it is considered that this space is struggling to find its identity while flanked by two very differently styled buildings of differing design and materiality. One edge is dealing with a pair of ogee curves, the opposite edge is a series of angles, and there is a change in centre-line orientation. The features of the square include a block of box trimmed trees, benches around a water feature, a series of triangular planters ‘responding’ to the curves in the building and a feature tree. At most times in the afternoon, it is thought that the tree will be shaded by the building to the south and it should be moved to a more consistently sunny spot. Overall, more planting and trees should be distributed throughout to provide pockets of shade and to break up the expanse of hard paving. The bosque like grid of trees is not unsupported but it seems too dense and

could do with more space to spread the trees out and for their branching to develop more naturally to create a shaded and natural space for people to use evocative of Lincoln Center in New York. Overall, it is felt the space needs more detailed design review and tissue studies comparing its size and scale with other similar sized open spaces in the area would be helpful in assessing whether it is large enough or small enough to serve the potential future residential and commercial users.

- *Amended comments: The changes respond to some of the comments above but it is still not clear if the identity of the space is suitable to the expected use pattern*
- Station Row and Station Row Piazza – Overall the swale and its presence is supported. It is considered however that the Piazza space could work harder as a public space. South-facing, it could be a nice suntrap for the colder months. In its current form there is a sense that it is only a place where routes converge rather than a place of its own.
  - *Amended comments: Minor changes in this area do not alter the comments though there is betterment overall.*
- Milton Way – The biggest concern with this area is the extent to which the basement impacts what is achievable. All planting is in planters which is likely to need supplemental watering during dry weather. Trees are pushed to the northern most edge and ultimately too close to the residential building and potentially causing nuisance as they mature. It is considered that the basement must be reduced in order that trees can be placed in this space with less constraint on their size and ability to establish and thrive to maturity. Cycle access to the cycle park is unclear. Despite the presence of three cycle routes in the vicinity, access to the building requires cyclists to cross vehicular routes or cycle in pedestrian areas to reach them. It is considered that this must be improved.
  - *Amended comments: changes to the layout plus additional information provided in the sectional elevations. While soil volume has been considered, it remains unclear what level of watering infrastructure will be available to these trees. Ultimately a LMMP which identifies supplemental watering for these trees during extended periods of dry weather which exceeds the needs of trees*



*in unconfined pits. Cycle access has been revised on the parameter plans and the ground floor plans and is found to be satisfactory.*

- Lab Pocket Parks – These spaces have always been constrained by their width (lack of) or the imposing size of the buildings to either size. They are urban and due to their orientation will be shadowed much of the time. During the pre-application process we pressed for these spaces to become wider allowing more tree planting which would aid in the buffering effect from the eastern viewpoints but in their current configuration they are too narrow to achieve this ideal.
- Streets –
  - The proposals for the Primary Street were well discussed at preapplication meetings and generally the proposals are accepted in general design and scope. Materiality is also generally to match existing though is expected to be upgraded in focus areas and where key junctions and crossings occur.
  - The proposals for the secondary streets
    - Cowley Road North proposals do not feel complete due to the lack of completeness of Wild Park. The street serves primarily parking basement accesses and service accesses and ends abruptly as a turning head and a collection of trees. Street trees positions and potential are acceptable but clearly a more masterplan approach should have been considered as it is unclear what is to be the character of this street upon the relocation of the NR Compound and the extension of the development northwards.
    - Cowley Road East also has an awkward role. Accessed from the south around the multi-story car park the narrowing in areas is welcome. An area between 7 and 8 meters is provided for tree planting allowing for at least 1 line of large growing trees and multiples of smaller trees and shrubs. These groups of tree planting will aid in providing some screening for the buildings, but ultimately the buildings are too big to receive significant screening from these trees.
    - The Link – Landscape has concerns about the impact of the building’s basement on the tree planting proposals. The tree pits are constrained significantly by highway proposals and the basement. It is recommended that the basement is reduced to improve the situation of these trees and prevent ‘lop-sided’ root growth.



- The proposals for tertiary streets at times seem complex when it comes to movement and access. There are several vehicular and cycle access points which cross the footway and often parallel parking bays are also in the way of access putting cycles and pedestrians in conflict. North facing garden and planting areas on Bramblefields Way may struggle with light availability. The same may apply to trees planted on this boundary and therefore shadow diagrams are needed to which allow consideration of this factor in design and species selection. There is also a concern that this tertiary street will be subject to all the vehicle movements outwards from the office building car park and thus may be very busy at peak times. Does it warrant upgrading to a Secondary Street?
- Bike storage access points are in awkward or difficult to reach areas, placing cyclists on pedestrian walkways or footways in order to reach the storage access points. Further, the way is often blocked by car parking bays so that access to either the street or the cycle path is made more difficult.
- Proximity of a private access door to a bike storage door in one instance is discouraged. There is likely to be general disturbance to the resident. Recommend the typology is handed or altered to separate the bike store from the apartment in a better way.
- The use of planters to strengthen thresholds is not recommended. Planters are often in need of supplementary watering during dry weather. Ideally, planting at ground level requires much less supplementary watering and management.
- The proposals include a significant increase in private vehicle movements along a stretch of the Guided Busway. This includes access to 1 Milton Way's basement car park which is accessed by way of a pair of car lifts. It also includes access to several Accessible parking bays and Visitor parking bays spread along Chesterton Way (Guided Busway) and Bramblefields Way (Northern-most east-west crossing street within the red line boundary)
- Meanwhile Uses – the approach to meanwhile uses related to planters, trees in planters, community gardening and mosaic habitat are not supported. Mosaic habitats are not ultimately attractive spaces, and their purpose is to support invertebrates and reptiles etc. and is made up of tough 'weeds', open earth, rock piles, and looks much like what derelict

land is. It is unlikely that small planter areas will attract much of the ecology that it is intended to attract, and its temporary nature is not in keeping with habitat creation. The use of the planters for community growing is also not supported as it is unclear who will be using them. It is also not clear how long the spaces will be in place for or whether their lifespan will be coordinate with a growing season (spring sowing, summer growing, autumn harvesting, winter cold crops etc) A draft phasing plan suggests two full growing seasons but will depend on the construction of the residential blocks and occupancy rates. Planters will also need significant supplemental watering. The temporary lawn, movie area, food trucks and lighting areas are more supportable as they are sustainable features that can more easily be moved and altered to suit a changing environment. Any meanwhile allotment spaces provided, ultimately cannot be used as a measurable (permanent) feature of the Residential open space standards given they will only likely be in use for up to 2 years.

- *Amendment Comments: a number of positive alterations have been made which improve the landscape proposals. Particularly with more consideration given to cycle access, meanwhile uses, and alterations to basement design to allow better conditions for proposed trees.*

## LVIA

- LVIA assessment proposed that ‘the Proposed Development does not result in any significant effects. [...] a proposal that appropriately responds to its context.’ The Landscape team considers that this assessment is unfairly concluded. Whilst the development benefits from existing vegetative screening from several receptor sites and views, the views which result in moderate-adverse to high-adverse effects are incredibly significant and sensitive. Primarily these are related to the eastern edge and impacts on Fen Ditton, Fen Ditton CA, Ditton Meadows, Greenbelt and users of footpath, cycle path and vehicular routes in these areas. This view is shared in the LCVIA prepared as Evidence for the NEC AAP preparation.
  - The following, from the Executive Summary of the NECAPP LCVIA document, states:
 

*The testing and appraisal of development height options indicates that adverse effects could be reduced through selective massing and layout of building heights across the [NECAPP] Site. The appraisal indicates there is scope for high and medium height development in the central part of the [NECAAP] Site with the majority of the Site able to accommodate **low** development without*



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*harm to the landscape and visual baseline. The Study allows a better understanding of where higher development could occur.*

It is considered that the proposals have not applied the recommendations of the NECAPP LCVIA findings to this development as all buildings are tall when reviewed against the recommends heights strategy produced as a result of the NECAAP LCVIA findings.

- The sensitivity to change is considered to be high despite the presence of the new Hotel and Office building (under construction). The River Cam's green corridor, part of the defining character of Cambridge, and which links farmlands in the south west of Cambridge to the fens in the north east is considered to be highly susceptible to harmful impacts as a result of change. It is considered that the hotel and office building do not set a precedent for development in the area but form the focus of a tall development cluster at the North Station, while the areas within the Proposed Development must be seen to be subservient and respectful to the existing development around it and the sensitive receptors discussed.
- Equally, it is considered that the impact on existing residential development at Discovery Way is undervalued by virtue of most of the impact being formed by Outline design work. The Outline seeks to set height parameters which exceed the limits set by the AAP and therefore we feel these constitute significant effects rather than a lack of a significant effects.
- The LVIA concludes by acknowledging a noticeable change in the study area and finds that a successful landscape scheme is crucial to mitigating the impacts. It is considered that the proposals require more than just successful landscape mitigations, but rather wholesale review of heights and mass across the site. Table 12.6 begins to suggest this approach by recommending 'development [...] appropriate to the Site's context in terms of scale, form, materiality and landscape' but it is not agreed that the proposals have achieved this aim.
- CCC Policy 60 was referenced as a potential material consideration due to the close adjacency of Cambridge City and the relationship between this site and the rest of Cambridge. Policy 60 requires new development that breaks the existing skyline and/or is significantly taller than the surrounding built form to be considered against certain criteria. The criteria apply to not only landscape, but townscape and heritage impacts. Applying the

requirements of the criteria against the viewpoints selected for LVIA/TVIA, Heritage and Policy 60 viewpoint, it is considered that the development has been unable to demonstrate that the proposals are a high-quality addition to the Cambridge skyline and that clearly, adverse impacts are present. Landscape provided to mitigate against harm is ineffective due to the mass, scale and height of the buildings.

- *Amendment comments: No updates were provided which address any previous comments; therefore, comments remain relevant.*

## Conclusion

To conclude, it is considered that due primarily to the reasons listed above, Landscape does **not** support:

- 1) An outline application (all matters reserved apart from access and landscaping) for the construction of:
  - a) three new residential blocks providing for up to 425 residential units and providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii))
  - b) and two commercial buildings for Use Classes E(g) i(offices), ii (research and development) providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), together with the construction of basements for parking and building services, car and cycle parking and infrastructure works.

OR

- 2) A full application for the construction of three commercial buildings for Use Classes E(g) i (offices) ii (research and development), providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)) with associated car and cycle parking, the construction of a multi storey car and cycle park building, together with the construction of basements for parking and building services, car and cycle parking and associated landscaping, infrastructure works and demolition of existing structures.

on the grounds of non-compliance with South Cambridgeshire District Local Plan policies SS/4 (4c, 4e), HQ/1 (1a, 1b, 1c, 1d, 1e, 1f, 1h, 1i, 1j, 1m, 2), NH/2, NH/8 (2,3), SC/7 (4), TI/2 (1, 2a, 2d), and TI/3