

Land north of Cambridge North Station, Cambridge
Brookgate Land Limited on behalf of The Chesterton Partnership
January 2023



LAND NORTH OF CAMBRIDGE NORTH STATION, CAMBRIDGE STATEMENT OF CASE FOR THE APPELLANT

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POLICY MATRIX – THE EMERGING NEC AAP		

1.0 Introduction

- 1.1 This appeal is made by Brookgate Land Limited on behalf of The Chesterton Partnership, [“the Appellant”], against the failure of South Cambridgeshire District Council [“the LPA”] to determine an application for planning permission reference 22/02771/OUT. The application site is known as Land to the north of Cambridge North Station [“the Site”].
- 1.2 Brookgate Land Limited is the development partner of Network Rail and DB Cargo UK, who collectively form The Chesterton Partnership. Network Rail is the freehold owner of Land to the north of Cambridge North Station, also known as part of the Chesterton Sidings site. Since 2015, the Chesterton Partnership have been working together to facilitate the redevelopment of the former railway sidings site as part of the wider redevelopment of Cambridge North.
- 1.3 The description of development comprises the following:
- A hybrid planning application for: a) An outline application (all matters reserved apart from access and landscaping) for the construction of: 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)); 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.*
- b) 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.*
- 1.4 The application was accompanied by an Environmental Statement [“ES”], prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).
- 1.5 The application was validated on 15 June 2022.
- 1.6 An amendment pack was submitted on 28 October 2022 in response to consultee comments. The LPA consulted on the amendment pack on 9 November 2022 requesting for comments by 9 December 2022. The LPA advised the Appellant on 18 November 2022 that the consultation date had been extended to 17 December 2022 owing to the fact that the site notice was posted on 17 November 2022.
- 1.7 The 16-week statutory determination deadline was 5 October 2022. The Appellant subsequently agreed an extension of time to 23 November 2022. The LPA has failed to determine the application by this date.

- 1.8 Notice of intention to submit an appeal against non-determination was issued to the Planning Inspectorate and the LPA on 19 December 2022.
- 1.9 Given that the appeal is lodged against the non-determination of the application, the LPA has not issued a decision notice, nor yet raised any putative reasons for refusal. The Appellant wishes to ensure as many matters as possible are agreed between the Appellant and the LPA in a statement of common ground, a draft of which is provided alongside this Statement of Case.
- 1.10 The Appellant anticipates the LPA raising putative reasons for refusal, which will require evidence being tested through formal questioning by an advocate before an inspector. Therefore, the Appellant is seeking determination via the inquiry procedure. The Site constitutes a large-scale allocation in the adopted local plan which is of significant local, regional and national importance and the scale and nature of the development proposals justify an inquiry.
- 1.11 To aid the Inspector and all those taking part with the inquiry, it is proposed to adopt a single comprehensive set of core reference documents. The agreed Core Documents will be provided in the final Statement of Common Ground.

2.0 Grounds for Appeal

- 2.1 The fundamental case for the Appellant will be;
- 2.2 Paragraph 81 of the National Planning Policy Framework [“Framework”] confirms: *“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).
- 2.3 The Government has an aspiration to make the UK a Science and Technology Superpower. The Site is a nationally important resource. The growth in the Cambridge knowledge economy and the life science and technology sectors particularly has been nothing short of phenomenal (known as the Cambridge Phenomenon) with demand outstripping supply by an extraordinary order of magnitude. As a consequence, opportunities to relocate world leading companies to Cambridge or expand vital start-ups are greatly diminished or non-existent. All of this blunts Cambridge’s competitive edge in the global market.
- 2.4 The LPA recognises that the Land allocated for development adjacent to Cambridge North station, of which the Site forms part, is one of the answers to this gross mismatch.
- 2.5 The Site continues to form an important part of the development strategy for the emerging Greater Cambridge Local Plan. The Greater Cambridge Local Plan : Development Strategy Update (Regulation 18 Preferred Options) (January 2023) prepared by the Greater Cambridge Shared Planning service confirms the development strategy for the new joint Local Plan. At paragraph 4.3.1 it states that North East Cambridge, of which the Site forms part, is *‘identified in the First Proposals strategy as the most sustainable location for strategic scale development available within Greater Cambridge’*.
- 2.6 The Site is for all intensive purposes previously developed land and is in public ownership. It is a vast untapped resource.
- 2.7 Over £100 million has already been committed to the regeneration of North East Cambridge through the construction of the Cambridge North station and infrastructure for the Novotel and One Cambridge Square developments.
- 2.8 The Appellant is a long-term investor in Greater Cambridge and has transformed the area around Cambridge central station into a multi-award winning urban project now home to three of the world’s 4 trillion dollar companies. It wishes to replicate that very successful place making and commercial model at Cambridge North but with even higher standards of sustainability.
- 2.9 The Site is allocated for an employment led scheme in Policy SS/4 of the adopted South Cambridgeshire District Council Local Plan 2018 [“the Local Plan”].

- 2.10 It is hard to imagine a scheme, site or city that better lends itself to meeting the Government's economic aspirations. Despite this, the Appellant has met significant resistance from the LPA. It has failed to grasp the opportunity and look at the benefits of the scheme for Cambridge, but also the wider UK economy.
- 2.11 Addressing policies HQ/1 and NH/8 of the Local Plan, the Appeal scheme is designed to be a healthy, inclusive, walkable, low-carbon development with a vibrant mix of high quality homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods.
- 2.12 The Appeal scheme acknowledges the LPA's declared climate change emergency and biodiversity emergency and fully integrates sustainable measures into the design of the scheme, transitioning into a low carbon future and providing climate adaptable buildings and spaces, in accordance with Local Plan policies CC/1, CC/3 and CC/4.
- 2.13 The development will result in less than substantial harm to the significance of designated heritage assets, for the purposes of the Framework, and sits at the very lowest end of this scale. Such a level of harm is consistent with that referred to in the North East Cambridge Heritage Impact Assessment (September 2021), prepared by Chris Blandford Associates and commissioned by the Greater Cambridge Shared Planning Service to inform the development of a Townscape Strategy for the emerging North East Cambridge Area Action Plan ["NEC AAP"].
- 2.14 The Appeal proposal is in accordance with the Development Plan when read as whole. It is hard to imagine a project that should benefit more from the "presumption in favour of sustainable development" as set out at paragraph 11 of the Framework and should be approved "without delay".

3.0 The Site and Context

- 3.1 The Site lies within the jurisdiction of South Cambridgeshire District Council and extends to approximately 9.9 hectares (ha). Cambridgeshire County Council is the highways authority for the Site.
- 3.2 The Site is for all intensive purposes previously developed land that comprises the existing surface level Cambridge North railway station car park of 428 spaces, areas of hardstanding and areas of scrubland.
- 3.3 The Site is bound to the north by the remainder of the former Chesterton Sidings site, to the east by the railway line, to the south by the recently constructed 'One Cambridge Square' office building and 'Two Cambridge Square' Novotel hotel building, and to the west and north-west by the Cambridgeshire Guided Busway ["CGB"] and Cambridge Business Park. Further south of the Site lies Cambridge North railway station, which opened in 2017.
- 3.4 The existing vehicular access to the Site is from Cowley Road which links Milton Road in the north down to Cambridge North station in the south. The road is single carriageway and there are footways on both sides of Cowley Road and a segregated cycleway on the western side of the road.
- 3.5 There is also pedestrian and cycle access to the Site from the CGB to the west and from Moss Bank to the south.
- 3.6 The Site is not located within the Cambridge Green Belt.
- 3.7 The Cambridge Green Belt lies to the east of the Site, to the east of the railway line, and further south and south-east of the Site.
- 3.8 The Site does not contain any heritage assets and no non-designated heritage assets are affected by the proposed development.
- 3.9 Fen Ditton Conservation Area and the Riverside and Stourbridge Common Conservation Area are the closest heritage assets to the Site, with parts of their boundaries lying approximately 500m from the Site.
- 3.10 The Site is located on the north-east edge of Cambridge and immediately adjoins the administrative boundary of Cambridge City Council to the south-west. It is approximately 3km from the city centre. The Site benefits from access to a range of public transport services which connect the Site with Cambridge City Centre, local regional destinations and national destinations via the rail and bus network.
- 3.11 A full description of the Site and its context is set out within the application documentation.
- 3.12 A plan showing the Site and its immediate context is set out below (Figure 1).



Legend:











- | | |
|---|---|
|  CAMBRIDGE NORTH STATION, NOVOTEL & ONE CAMBRIDGE SQUARE |  ST JOHN'S INNOVATION PARK |
|  INDUSTRIAL ESTATE |  CAMBRIDGE SCIENCE PARK |
|  AGGREGATES RAILHEAD |  NUFFIELD ROAD INDUSTRIAL ESTATE |
|  WASTE WATER TREATMENT PLANT |  SUNNINGDALE CARAVAN PARK |
|  CAMBRIDGE BUSINESS PARK |  RED LINE BOUNDARY |

Figure 1 – Surrounding context plan

4.0 Development Plan

4.1 National Planning Guidance sets out “*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 – these provisions also apply to appeals).*”

4.2 The relevant development plan in this case comprises the following:

- Adopted South Cambridgeshire District Council Local Plan (2018) and Proposals Map (2018); and
- Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021).

South Cambridgeshire District Council Local Plan (2018)

4.3 The Site forms part of the Major Development Site allocation within the Local Plan referred to as ‘Cambridge Northern Fringe East and Cambridge North railway station’, as identified under Policy SS/4.

4.4 An extract of the Local Plan Proposals Map is shown in Figure 2 below.

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021)

4.5 The Cambridgeshire and Peterborough Minerals and Waste Local Plan sets out several allocations which cover the Site. These identify the Site as being within:

- I. the consultation area for the Cambridge Northern Fringe Aggregates Railheads (Transport Infrastructure Area) (TIA) (Policy 16 (Consultation Areas));
- II. the consultation area for the Cowley Road Waste Management Area (WMA), also known as the Cambridge Waste Transfer Station (Policy 16 (Consultation Areas));
- III. the consultation area for the Cambridge Water Recycling Area (WRA) (Policy 16 (Consultation Areas)); and
- IV. a Sand and Gravel Mineral Safeguarding Area (Policy 5).

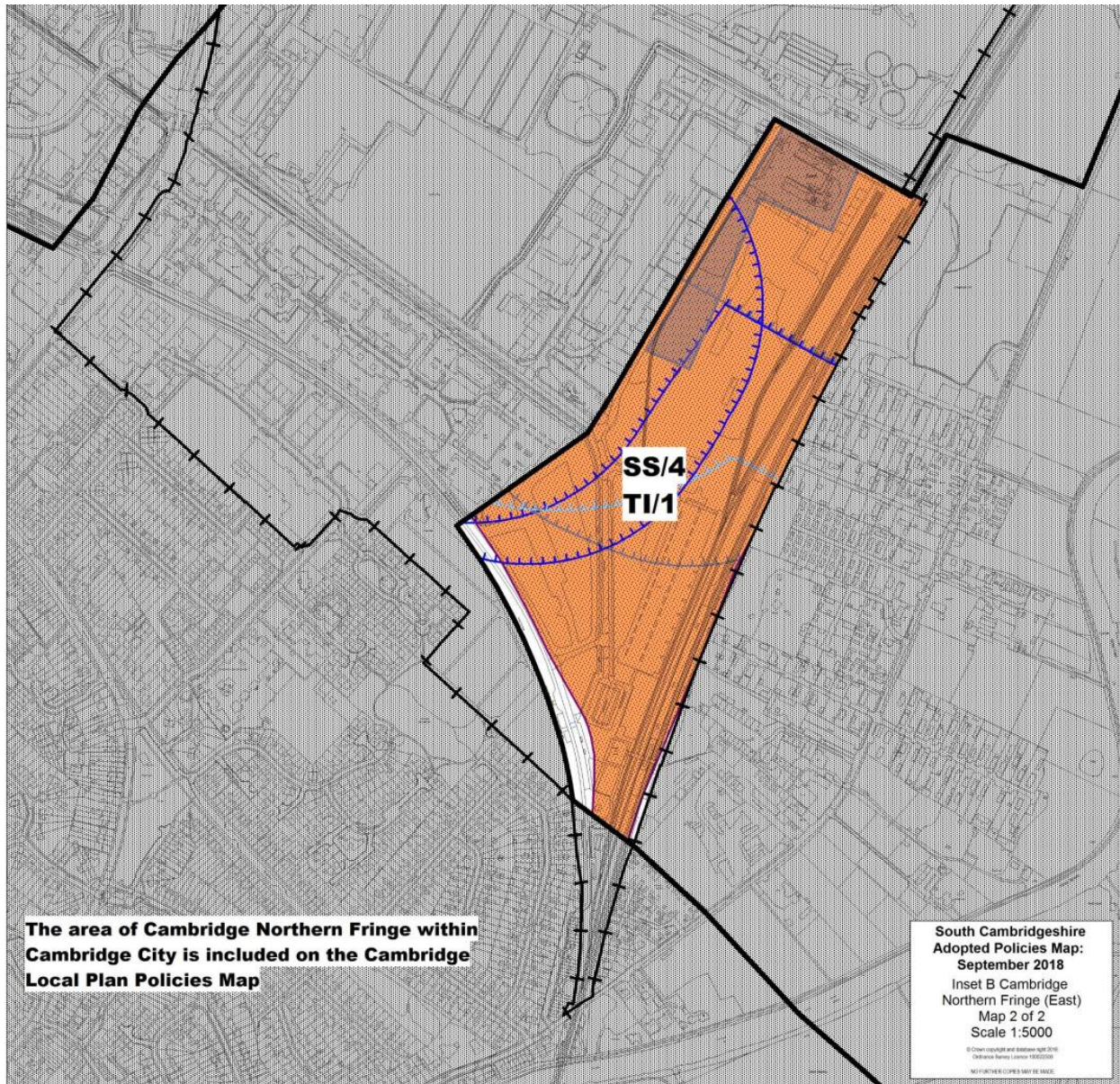


Figure 2 – South Cambridgeshire Local Plan 2018 – Extract of Proposals Map

5.0 Emerging North East Cambridge Area Action Plan and its supporting evidence base

- 5.1 The LPA and Cambridge City Council are jointly preparing an Area Action Plan ["AAP"] for North East Cambridge ["NEC"]. Once adopted the AAP would form part of the statutory development plan for both Councils. It will set out a series of site specific policies and propose the mix and quantum of development for the land within the AAP boundary. The Site falls within the boundary of the emerging NEC AAP.
- 5.2 The Framework states that decision makers may give consideration to relevant policies in emerging plans but that the weight applied should reflect a) the stage of preparation, b) the extent to which there are unresolved objections and c) the degree of consistency that the emerging policies have to the Framework itself (Paragraph 48).
- 5.3 It is the Appellant's view that the draft AAP remains at an early stage in its preparation, is subject to a number of significant unresolved objections, and is entirely dependent on the outcome of an uncertain Development Consent Order ["DCO"] process (see below) and, therefore, can only be afforded very limited weight in the determination of planning applications.
- 5.4 Work on the NEC AAP began in 2013, with the most recent consultation taking place between July 2020 and October 2020 on the draft version of the AAP (Regulation 18).
- 5.5 The Proposed Submission version of the emerging NEC AAP (Regulation 19) was reported to the respective decision-making committees of the Councils over December 2021 to January 2022 and was approved for public consultation. However, the LPA has taken the decision not to progress the Proposed Submission version of the NEC AAP to public consultation due to uncertainties regarding the outcome of the DCO process for the relocation of the Cambridge Waste Water Treatment Plant ["CWWTP"], which currently sits within the AAP boundary.
- 5.6 The application for the DCO is expected to be submitted to The Planning Inspectorate in Q1 2023 and could take approximately 15 months to process.
- 5.7 The Councils have published a number of evidence papers to support the draft policies and proposals of the Proposed Submission version of the emerging NEC AAP, together with a series of non-statutory Development Management Guidance documents. The evidence base is also subject to objection from landowners within the AAP boundary including the Appellant and has been subject to limited or no consultation. As such, it is the Appellant's view that the AAP evidence base documents and Development Management Guidance also have very limited weight in the determination of planning applications.
- 5.8 Notwithstanding the Appellant's view that the draft NEC AAP should be afforded very limited weight in the determination of planning applications, the Appellant has sought, where appropriate and where consistent with national policy, to align with the draft AAP.
- 5.9 The Appeal proposal does not prejudice the delivery of the wider AAP should that come forward, rather, it is an enabler to its delivery. There is significant unmet commercial demand for office and Research & Development space in the Cambridge North area and the wider market. Cambridge

needs and deserves the buildings that have been designed as part of the Appeal proposal. The Site sits at the gateway of the hub for Research & Development which already provides the European home for many global technology companies. The supporting text to Policy SS/4 of the Local Plan confirms, at paragraph 3.31, that '*early development around Cambridge North station could help create a vibrant area around this key infrastructure to meet the needs of users of the station and bring forward further phased delivery elsewhere within the CNFE ["Cambridge Northern Fringe East"] area*'.

- 5.10 A full list of all relevant draft policies in the draft AAP and a response against each regarding the development proposals is provided at **Appendix 1**.

6.0 The Appeal Scheme

- 6.1 Overall, the project aims to deliver a high quality, mixed use development ensuring environmental, economic, and social sustainability throughout. It will form the next phase of the Cambridge North redevelopment which will further build on the momentum created by the opening of the Cambridge North Station and the adjoining Novotel hotel development constructed under planning permissions S/3102/15/FL, 15/2317/FUL and S/2372/17/FL and the One Cambridge Square office development which is currently under construction pursuant to planning permission S/4824/18/VC.
- 6.2 The residential quarter will comprise up to 425 homes across three blocks, including ground floor amenity uses. The commercial accommodation will include for up to 53,700 sqm of Class E floorspace (NIA) across five buildings, including ground floor amenity uses. A Multi Storey Car Park (also referred to as Mobility Hub) is also proposed. A hybrid planning application was submitted, with some elements in outline and some in full.

Outline Element

- 6.3 The outline application is for all matters to be reserved apart from access and landscaping. A suite of parameter plans were submitted with the application to detail the proposed land uses, building heights, access and movement, and open space and landscaping. The supporting Design and Access Statement ["DAS"] includes illustrative material which demonstrates how the proposals could be delivered within the proposed parameters.

Land Use

- 6.4 The outline application comprises;
- **The Residential Quarter** (buildings S11-S12), (S13-S16), and (S17-S21);
 - **The Triangle Site**, comprising One Chesterton Square (building S09) and Two Milton Avenue (building S08).
- 6.5 The Residential Quarter is proposed to accommodate up to 425 homes within three perimeter blocks. Unit sizes range from 1 bedroom to 3 bedroom homes. 155 of the homes will be open market and affordable units (within block S13-S16). The remaining 270 homes will be Build to Rent units ["BtR"] (within block S11-S12 and block S17-S21). Block S17-S21 and block S11 – S12 are proposed to accommodate a number of amenities located at ground floor level. At this outline stage, the exact uses at ground floor level are not finalised but it is envisaged that they could include retail, community and/or commercial services.
- 6.6 The Triangle Site is proposed to accommodate two commercial buildings (Use Class E (g) (i) / (ii)), referred to as One Chesterton Square (building S09) and Two Milton Avenue (building S08). Both buildings are proposed to accommodate amenity provision at ground floor level and a basement level to accommodate car parking, cycle parking, shower facilities and associated changing rooms and drying rooms, plant and storage.

Building Heights

- 6.7 The Building Height Parameter Plan identifies the maximum building heights permitted across the Site. Heights will range between 4 and 8 storeys. Lower heights are proposed to be located on the eastern edge of the Site along the railway edge and on the western edge of the Site with the tallest buildings to be located along Milton Avenue and in key nodal points.

Movement and Access

- 6.8 The Movement and Access Parameter Plan identifies the indicative alignments of the roads within the Site, together with the preferred alignment of the proposed cycle and pedestrian network.
- 6.9 Means of access and detailed junction design are proposed as part of this Appeal proposal, including;
- **Proposed Cowley Road/Milton Avenue Junction ‘Cowley Circus’** – a new crossroad design. This has been subject to a Road Safety Audit undertaken by the local highway authority, with all identified issues addressed through the follow-up designer’s response; and
 - **Proposed Milton Avenue/The Link/Cowley Road East Junction** – amendment of existing junction to incorporate an extended raised table, a new arm to the east providing access to the Mobility Hub and for servicing vehicles to access the rear of One and Three Station Row and a crossing of the Station Row cycle route over Milton Avenue to tie in with the route along the western side which provides connections north and south.
- 6.10 The primary road of the Site will be the existing Cowley Road/Milton Avenue. However, the footway/cycleway on the western side are proposed to be switched from the current situation so that the cycleway is located closest to the carriageway to tie into the masterplan proposals. Additionally, space within the verges would be provided to accommodate disabled parking and loading bays.
- 6.11 Secondary roads will comprise a road from Cowley Road to the Cambridge North railway station car park (referred to in the masterplan as ‘Cowley Road north’), a road along the eastern edge of the Site (referred to in the masterplan as ‘Cowley Road east’) and the existing link road from Cowley Road to the CGB (referred to in the masterplan as ‘The Link’).
- 6.12 The proposed tertiary streets are more compact in nature and enclose the Residential Quarter, with the existing CGB (referred to in the masterplan as ‘Chesterton Way’) forming the western edge and a new street referred to in the masterplan as ‘Bramblefields Way’ forming the northern edge.
- 6.13 The layout of the Site has been designed to complement wider development proposals across NEC through the provision of a street and active travel network layout that can connect to, and provide through-links to future development opportunities across the wider area.

Landscape and Public Realm

- 6.14 Details of landscaping are proposed as part of the Appeal scheme. The Landscape Masterplan demonstrates the location, quantum, and function of green spaces within the Site. In addition, the phased construction of the development provides excellent opportunities for 'meanwhile' uses, providing active and attractive temporary spaces for the new occupants of early phases.
- 6.15 The key areas comprise:
- **Chesterton Gardens** – a central park within the residential quarter which comprises extensive tree planting, lawn mounds, sinuous paths, planting, play areas, pergolas for gatherings and seating areas;
 - **Chesterton Square** – a public square within the commercial quarter which comprises trees, water feature jets and 'sky mirror', raised beds, planting, seating, and a 'follow me' paving band that enlivens the space;
 - **Station Row** – a linear swale with ecologically diverse plantings, seating-steps and causeway crossings;
 - **Piazza** – a pocket park at the termination of Station Row, with wide a crossing path to One Milton Avenue and the Residential Quarter;
 - **Milton Way** – a pocket park and passageway for cyclists, with spill-out space for office workers and residents. Raised planters sit over basements, with integrated seating;
 - **Courtyards** - West-facing residents' courtyards, overlooking a tree belt, to include seating and tree planting; and
 - **Wild Park** – areas of retained Open Mosaic habitat and new Open Mosaic restoration, a balancing pond, a circular recreational walk and areas of natural play.

Full Element

- 6.16 The hybrid application includes a full application for;
- One Milton Avenue (building S04);
 - Mobility Hub (building S05); and
 - One and Three Station Row (buildings S06 and S07).

One Milton Avenue (S04)

- 6.17 One Milton Avenue is a proposed office building (GEA of 18,575 m²) and has been designed to achieve a BREEAM Excellent rating. The building includes retail space at ground floor level (84 m² GIA), accessed via Milton Avenue.
- 6.18 The building is seven storeys in height plus plant. The building steps back to the north and west from level 05 upwards, offering significant amenity space to the building users.
- 6.19 Buff brick stock has been selected as an appropriate response to the general Cambridge aesthetic, with two tones of metallic panels selected to enhance the warm palette of materials.

The lighter bronze finish has been chosen to mediate between the brick and the glazed areas, whereas the darker bronze finish has been used to highlight key architectural features.

Mobility Hub (S05)

- 6.20 The Mobility Hub is proposed to accommodate 725 car parking spaces across 5 levels (including ground floor). 622 of these spaces would be provided for rail users, re-providing the existing 428 surface car parking spaces, and accommodating a further 194 spaces for potential rail-related use should further growth in passenger demand occur in the future. The remaining 103 spaces of the parking capacity would be provided at basement level of the Mobility Hub for the use of the commercial development.
- 6.21 This proposal therefore retains the option for further rail-related parking provision, currently available via the option of decking the existing surface level railway station car park, when the current rail-related spaces are relocated into the Mobility Hub.
- 6.22 Network Rail has indicated that retaining the flexibility to provide further parking for passengers is important to them. However, the time period over which passenger demand might grow, and hence trigger the potential need for additional spaces, is still uncertain.
- 6.23 It is therefore proposed that the additional 194 spaces are used flexibly over time, in accordance with a car parking management plan as summarised below:
- The spaces would continue to be safeguarded for potential rail-use in the longer term.
 - Initially, the additional spaces would be used by early tenants of buildings proposed in the Appeal proposals – Cambridgeshire County Council Highway's Team has verbally indicated that they accept that there might be a need for higher levels of trip-making in the short to medium term as the NEC area transitions to a low car future, subject to the end-state still operating within the vehicle trip budget.
 - As future phases of development at Cambridge North come forward, the use of those spaces would be de-allocated from current users and reallocated to future occupants.
 - At the same time, the use of the current levels of rail-related parking (428-spaces) would be monitored. Should demand approach 85% of capacity, and subject to the appropriate approvals at that time, the spaces could then be reallocated for rail passenger use and de-allocated from other users.
 - It is proposed that this arrangement can be secured as part of the proposed planning conditions or S106 agreement for the development.
- 6.24 The Mobility Hub also provides three flexible Class E use units at ground floor level on the western frontage of the building, facing onto Station Row, providing the opportunity for the co-location of mobility services and facilities for the benefit of future residents, employees and visitors to Cambridge North.
- 6.25 Access to the Mobility Hub will be via the new 'Cowley Road east' which will run along the eastern boundary of the Site.

- 6.26 The Mobility Hub will feature folded metal panels on the western façade and perforated metal panels on the eastern façade. The western façade includes a feature stair at the south western corner to signal the gateway leading towards the rest of the development. This elevation forms one of the main pedestrian flows from the station and has also been enhanced by active frontages to enliven the pedestrian experience.

One and Three Station Row (S6 and S7)

- 6.27 One and Three Station Row are laboratory buildings and have been designed to achieve a BREEAM Excellent rating. One Station Row (excluding the basement) has a GEA of 11,407 m² and Three Station Row has a GEA of 12,061 m².
- 6.28 Both One and Three Station Row are four storeys in height, plus plant. The building blocks step back to the east and west at level three, offering amenity space for the building users.
- 6.29 Flexible retail provision (and other complementary ground floor uses) are proposed at ground floor level, accessed off 'Station Row' Passage to the west (1,168 m² GIA). The retail uses ensure an activated frontage to Station Row Passage. The side passages contain pocket parks, and visitor cycle parking.
- 6.30 The design development of the façades revolve around the introduction of two planning grids. These articulate the alternating fingers, provide legible ground floor entrances, and define the recessed terraces. The larger, more civic grid is composed of a precast composition, and is continuous from the ground to the screened plant level. The smaller, more vertical grid is composed of brick piers and contains the building cantilevers, marking the entrances and stepping back to reveal the level 03 amenity terrace and the level 04 plant room screen.
- 6.31 The brick stock has been selected as an appropriate response to the general Cambridge aesthetic, with natural pre-cast concrete / stone panels to provide a visual contrast between the alternating blocks. Complimentary coloured metal spandrels have been selected for the opaque elements, as well as the lining to the brick piers, providing visual warmth and a finer grain of detail.

7.0 The Appeal Case

Introduction

- 7.1 Paragraph 81 of the National Planning Policy Framework [“Framework”] confirms: “*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).
- 7.2 The Government has an aspiration to make the UK a Science and Technology Superpower. The Site is a nationally important resource. The growth in the Cambridge knowledge economy and the life science and technology sectors particularly has been nothing short of phenomenal (known as the Cambridge Phenomenon) with demand outstripping supply by an extraordinary order of magnitude. As a consequence, opportunities to relocate world leading companies to Cambridge or expand vital start-ups are greatly diminished or non-existent. All of this blunts Cambridge’s competitive edge in the global market.
- 7.3 The LPA recognises that the North East Cambridge allocation is one of the answers to this gross mismatch.
- 7.4 North East Cambridge continues to form an important part of the development strategy for the emerging Greater Cambridge Local Plan. The Greater Cambridge Local Plan : Development Strategy Update (Regulation 18 Preferred Options) (January 2023) prepared by the Greater Cambridge Shared Planning service confirms the development strategy for the new joint Local Plan. At paragraph 4.3.1 it states that North East Cambridge is ‘*identified in the First Proposals strategy as the most sustainable location for strategic scale development available within Greater Cambridge*’.
- 7.5 The Site is for all intensive purposes previously developed land and is in public ownership. It is a vast untapped resource.
- 7.6 Over £100 million has already been committed to the regeneration of North East Cambridge through the construction of the Cambridge North station and infrastructure for the Novotel and One Cambridge Square developments.
- 7.7 The Appellant is a long-term investor in Greater Cambridge and has transformed the area around Cambridge central station into a multi-award winning urban project now home to three of the world’s 4 trillion dollar companies. It wishes to replicate that very successful place making and commercial model at Cambridge North but with even higher standards of sustainability.
- 7.8 The Site is allocated for an employment led scheme in Policy SS/4 of Local Plan.
- 7.9 It is hard to imagine a scheme, site or city that better lends itself to meeting the Government’s economic aspirations.

- 7.10 Addressing policies HQ/1 and NH/8 of the Local Plan, the Appeal scheme is designed to be a healthy, inclusive, walkable, low-carbon development with a vibrant mix of high quality homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods.
- 7.11 The Appeal scheme acknowledges the LPA's declared climate change emergency and biodiversity emergency and fully integrates sustainable measures into the design of the scheme, transitioning into a low carbon future and providing climate adaptable buildings and spaces, in accordance with Local Plan policies CC/1, CC/3 and CC/4.
- 7.12 The development will result in less than substantial harm to the significance of designated heritage assets, for the purposes of the Framework, and sits at the very lowest end of this scale. Such a level of harm is consistent with that referred to in the North East Cambridge Heritage Impact Assessment (September 2021), prepared by Chris Blandford Associates and commissioned by the Greater Cambridge Shared Planning Service to inform the development of a Townscape Strategy for the emerging North East Cambridge Area Action Plan ["NEC AAP"].
- 7.13 The Appeal proposal is in accordance with the Development Plan when read as whole. It is hard to imagine a project that should benefit more from the "presumption in favour of sustainable development" as set out at paragraph 11 of the Framework and should be approved "without delay".

Compliance with the Development Plan

- 7.14 The most relevant development plan policies against which the proposals are assessed are set out below.

Site Allocation – Policy SS/4

- 7.15 The Site is allocated in the Local Plan as part of a high quality mixed-use development, under Policy SS/4. The appeal development proposals wholly accord with Policy SS/4, as set out below.

Policy SS/4: Cambridge Northern Fringe East and Cambridge North railway station

1. The Cambridge Northern Fringe East and Cambridge North railway station will enable the creation of a revitalised, employment focussed area centred on a new transport interchange.

2. The area, shown on the Policies Map, and illustrated in Figure 6, is allocated for high quality mixed-use development, primarily for employment within Use Classes B1, B2 and B8 as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions).

- 7.16 The Appeal scheme is for a high quality mixed-use, employment-led scheme, together with a range of supporting uses.

3. *The amount of development, site capacity, viability, time scales and phasing of development will be established through the preparation of an Area Action Plan (AAP) for the site. The AAP will be developed jointly between South Cambridgeshire District Council and Cambridge City Council, and will involve close collaborative working with Cambridgeshire County Council, Anglian Water and other stakeholders in the area. The final boundaries of land that the joint AAP will consider will be determined by the AAP.*

7.17 The supporting text to Policy SS/4 states, at paragraph 3.29, that;

*“An **early review** of the site through a jointly-prepared Area Action Plan (AAP) will ensure a coordinated approach is taken. This will enable the feasibility of development and its viability to be properly investigated and will ensure a comprehensive approach to redevelopment.”* (emphasis added).

7.18 It continues, at paragraph 3.31, in stating that;

*“Cambridge North railway station will provide a catalyst for regeneration of this area. Early development around Cambridge North station could help create a vibrant area around this key infrastructure to meet the needs of users of the station and bring forward further phased delivery elsewhere within the CNFE area. **Planning applications submitted before the adoption of the AAP will be considered on their own merits and subject to ensuring that they would not prejudice the outcome of the AAP process and the achievement of the comprehensive vision for the area as a whole that will be established by the AAP.**”* (emphasis added).

7.19 The ‘early review’ has not progressed and preparation of the AAP has been significantly delayed. As such, the draft AAP remains at an early stage of preparation and can only be afforded very limited weight in the determination of planning applications. This has meant that that limb (3) of Policy SS/4 has not been engaged.

7.20 The Appeal proposal does not prejudice the delivery of the wider AAP should that come forward, rather, it is an enabler to delivery and will help to support the continued regeneration of the area.

4. All proposals should:

a. Take into account existing site conditions and environmental and safety constraints;

7.21 The planning application is supported by a suite of technical assessments which take into account the existing site conditions and environmental and safety constraints. These are explained in the application supporting documentation.

b. Demonstrate that environmental and health impacts (including odour) from the Cambridge Water Recycling Centre can be acceptably mitigated for occupants;

7.22 The Addendum Report – Updated odour dispersion modelling for Cambridge Water Recycling Centre (December 2020), prepared by Olfasense UK Ltd and commissioned by South Cambridgeshire District Council to inform the emerging NEC AAP, confirms that the Site falls outside of the odour contours of the Cambridge Water Recycling Centre. Furthermore, an odour

statement has been prepared in support of the application and confirms there are no predicted significant odour impacts at the Site from the CWRC. Therefore, no odour mitigation is considered to be required and is not proposed. There are no other environmental or health impacts arising from the Cambridge Water Recycling Centre requiring mitigation for occupants of the Appeal scheme.

c. Ensure that appropriate access and linkages, including for pedestrians and cyclists, are planned for in a high quality and comprehensive manner;

- 7.23 The Illustrative Masterplan and Access and Movement Parameter Plan includes for a comprehensive network of dedicated footways, footpaths and cycle paths throughout the Site to ensure maximum connectivity through the development and to the surrounding areas. Multiple discussions with Camcycle have facilitated a coordinated cycle and pedestrian strategy.

d. Recognise the existing local nature reserve at Bramblefields, the protected hedgerow on the east side of Cowley Road which is a City Wildlife Site, the First Public Drain, which is a wildlife corridor, and other ecological features, and where development is proposed provide for appropriate ecological mitigation, compensation, and enhancement measures either on- or off-site;

- 7.24 A full suite of ecological surveys were submitted as part of the application to inform the development proposals for the Site and identify appropriate mitigation, compensation and enhancement measures. A Biodiversity Net Gain (BNG) Report based upon DEFRA's BNG 3.1 metric has been prepared in support of the application and a BNG gain of 66.79% can be delivered. Proposals include reinforcement and ecological enhancement of the tree belt and understory vegetation between the Guided Busway and the Bramblefields and Nuffield Road Allotment sites.

e. Ensure that the development would not compromise opportunities for the redevelopment of the wider area.

- 7.25 Two illustrative strategic masterplans were submitted as part of the application. These expand on information submitted within the Design and Access Statement and show how the Site relates to the wider context both in terms of the remainder of the 'Cambridge North' site under the control of Brookgate Land Ltd and the wider area within the emerging NEC AAP. The illustrative strategic masterplans clearly demonstrate that the Appeal proposal has had regard to existing site circumstances whilst also being able to contribute to delivery of the vision and strategic objectives for the emerging NEC AAP.

- 7.26 Brookgate Land Ltd and the Applicant team has also been actively engaging with officers from the Councils and representatives from surrounding landowners as part of the Landowner Liaison Forums for the emerging NEC AAP and has undertaken engagement with the local community.

Building a Strong and Competitive Economy

- 7.27 The Appeal scheme is ideally suited for employment uses and will support the development of an office and Research & Development cluster.

- 7.28 Facilitating the directions of the Framework, the Local Plan establishes the objectively assessed need for 19,500 new homes and 22,000 new jobs in the district by 2031.
- 7.29 Delivering 22,000 new jobs will require development of additional employment land over the life of the Local Plan. The Economy chapter (Chapter 8) of the Local Plan provides a set of policies that focus on delivering the types of employment appropriate to both support the Cambridge cluster and to provide a diverse range of local jobs to ensure a strong and vibrant local economy into the future.
- 7.30 The Site is a specific site identified in Chapter 8 of the Local Plan as an employment land allocation especially suited for cluster development – under Policy E/9 of the Local Plan.
- 7.31 In 2020, Cambridge City Council (in partnership with the LPA) commissioned a consortium of consultants to assess employment land supply and demand. The resulting Employment Land and Economic Development Study 2020 [“ELEDs”] was published in November 2020. It identified four key office submarkets. The Site is within the submarket area identified as the NEC AAP submarket at Figure 9.
- 7.32 The ELEDs confirms that the NEC AAP submarket is key for Research & Development. Agents explained that the opening of Cambridge North station in 2017 will continue to create more development opportunities, and thus many other high-value companies have now started looking to Cambridge North for easy transport links (paragraph 2.79). The Evidence Study recommends that the LPA continues to respond positively to proposals that can be considered on their merits, or through further allocation.
- 7.33 The Appeal scheme is forecast to generate approximately 2,020 additional construction roles over the five-year construction period and approximately 4,300 net additional jobs after the Site is complete and the development fully operational. The development will make a significant contribution to the local economy, especially as a proposal to support the knowledge-based Research & Development cluster in North East Cambridge.
- 7.34 The proposals are therefore in accordance with Local Plan Policies S/2 and E/9.

Delivering High Quality Homes

- 7.35 The proposed overall indicative housing mix has reflected discussions with officers at pre-application stage and provides the choice, type and mix of housing to meet the needs of different groups in the community.
- 7.36 The BtR market report accompanying the application confirms the strong demand for a Build to Rent product in Cambridge. In particular, the proposed BtR units would meet the needs of a particular demography of private renters in the City that the housing market is not currently adequately serving – the ‘in-betweens’. This demography clearly lends itself to smaller dwelling sizes given the limited prevalence of children and the need to minimise rents to reflect the wages achievable by those aged 25-34 at the start of their careers.

- 7.37 Annex 9: Build to Rent policy of the LPA's adopted Greater Cambridge Housing Strategy provides context and guidance on how the LPA will approach BtR schemes. At paragraph 8, it recognises that no single model applies to BtR schemes and paragraph 52 highlights the LPA's own research points to a current demand for 1 and 2 bedroom units.
- 7.38 Therefore, whilst the proposal does not strictly accord with the requirements of part (1) of the Local Plan Policy H/9 in terms of housing mix, this by itself does not render the scheme in conflict with Policy H/9. The housing mix reflects the nature of the development and the BtR element contained within it, which is not a tenure mix identified in the adopted Local Plan.
- 7.39 In terms of affordable housing, in line with the BtR policy within the Greater Cambridge Housing Strategy and national guidance, 20% of the BtR units will be affordable. In terms of the market homes, in line with Local Plan Policy H/10, 40% of the homes will be affordable.
- 7.40 The proposals are therefore in accordance with policies H/9 and H/10.

Meeting Community Needs

- 7.41 The development will deliver for circa 4,500 sqm of flexible Class E or Class F uses at ground floor. The specific use of the floorspace has not yet been specified but has the potential to be utilised for a range of activities.
- 7.42 The proposals are therefore compliant with Policy SC/4.

Sustainable Transport and Connectivity

- 7.43 The Site is located in a highly sustainable location with excellent public transport infrastructure and access by bus, rail and active modes.
- 7.44 There are a number of high-quality cycling links in the immediate vicinity of the Site. Bus stops served by the Busway B and Citi 2 services lie within 400m of the Site and Cambridge North station is located approximately 100m to the south of the Site. Cambridge North Station is well connected into the local and regional rail network by frequent train services that serve, or can connect with, London, other key destinations in East Anglia, cross-country services to the East and West Midlands, and Stansted Airport.
- 7.45 The location of the proposed development and its accessibility by public transport and active modes would discourage the use of private motor vehicles with a choice of public transport and exemplar active travel (walking, cycling, scooting and wheeling) facilities readily available.
- 7.46 Transport impacts have been assessed as part of the ES and are set out in detail in Chapter 17 of the ES. The application was also accompanied by a Transport Assessment ["TA"] and Travel Plan ["FTP"]) (ES Appendix 17.1 and 17.2), the methodology and scope of which has been agreed by Cambridgeshire County Council highways officers.

- 7.47 The emerging NEC AAP has been informed by a suite of background technical studies, one of which is the North East Cambridge Area Action Plan Transport Evidence Base ["TEB"] (September 2019), prepared by Mott Macdonald and commissioned by Cambridgeshire County Council. The TEB includes a modelling exercise which establishes a vehicular trip budget for the NEC AAP area that it suggests could take place without creating a severe impact on local highway conditions; 3,900 two-way vehicle trips in the AM peak hour and 3,000 two-way vehicle trips in the PM peak hour.
- 7.48 The TEB also addresses car parking, together with a subsequent Transport Position Statement, prepared by the Greater Cambridge Shared Planning Service and Cambridgeshire County Council (May 2020 (revised February 2022)). These reports establish a proposed overall car parking budget for the NEC AAP area (4,800 spaces).
- 7.49 The overall trip and parking provision for the NEC AAP area has been apportioned to individual areas within the NEC AAP area, as set out within the NEC AAP draft High Level Transport Strategy (2021), prepared by Pell Frischmann on behalf of the transport consultants acting for a number of individual development sites within the NEC AAP area (the 'Core' site, Brookgate, Cambridge Business Park, St Johns and the Cambridge Business Park) and endorsed by the County Council. The Site falls within a wider area known within the NEC AAP as the 'Chesterton Sidings' site (and referred to within the TA submitted in support of the application as the Cambridge North allocation. The Cambridge North allocation is under the control of the Appellant.
- 7.50 In terms of vehicle trip budget, the TA and subsequent technical work undertaken following an amendment to the parking strategy demonstrates that the Appeal proposals are forecast to operate within the draft vehicle trip budget assigned to the Cambridge North allocation, with a 'headroom' level of trips remaining in both directions in both the AM and PM peak hours.
- 7.51 In terms of car parking budget, the overall level of car parking proposed (611 spaces for the commercial and 22 for the residential) also sits well within the parking budget assigned to the Cambridge North allocation (873 spaces). The proposed car parking levels are also significantly lower than the maximum permitted by the parking standards within the Adopted Local Plan.
- 7.52 The development impacts are not considered to result in a severe residual impact on the highway network in reference to the terms of the Framework (paragraph 111).
- 7.53 In terms of Electric Vehicle (EV) charging, provision would be made within the car parks associated with the commercial element of the development for each bay to have an EV charger. All of the parking bays around the residential part of the Site would be enabled for electric vehicle charging.
- 7.54 In terms of cycle parking, the provision for each of the commercial buildings would be provided through a combination of ground floor and basement parking within each of the respective buildings. In addition to the provision within the buildings themselves, surface level cycle parking is proposed across the Site, located close to building entrances. This parking would take the form of Sheffield stands, also incorporating some stands spaced at 2m to accommodate non-standard cycles. Across the Site, 207 stands are proposed, accommodating 414 spaces. This exceeds the level of provision suggested by the standards within LTN 1/20.

- 7.55 The residential development would provide cycle parking at a rate of one space per bedroom. The spaces would be provided within secure dedicated cycle stores located at ground floor across the residential part of the Site. The cycle stores would be directly accessed from the street and the central garden.
- 7.56 The proposals are therefore in accordance with Policies TI/2, TI/3 and the NEC TEB and Transport Position Statement.

Public Open Space and Landscaping

- 7.57 Overall, the amount of open space provided by the scheme, on-site or through planning obligations, is consistent with the open space standards and Policy SC/7 of the Local Plan. The provision of informal space, allotments/growing space and informal children's play space meets or exceeds the LPA's space requirement for the proposed occupancy, as set out in the LPA's Open Space Supplementary Planning Document (SPD) (2009). The provision for equipped/formal play is met through an approach that makes use of the rich 'natural play' opportunities in the Wild Park whilst complying with 'Buffer Zone' setbacks by existing roads. Furthermore, the development will, additionally deliver a series of dynamic and coordinated streetscapes and substantial areas of public realm that are attractive, well-designed and accessible and inclusive.
- 7.58 In addition, the phased construction of the development provides excellent opportunities for 'meanwhile' uses, providing active and attractive temporary spaces for the new occupants of early phases.
- 7.59 The proposal is therefore also compliant with Policies NH/2 and NH/6.

Ecology and Biodiversity

- 7.60 The development would result in the loss of up to 1.85ha of Open Mosaic Habitat ["OMH"]. In order to mitigate the effect on OMH, retention and the creation of replacement habitat is proposed.
- 7.61 A Biodiversity Net Gain ["BNG"] assessment of the Site has been undertaken using the Defra biodiversity metric version 3.1. The Defra calculation tool indicates that the baseline value of the Site is 48.86 units, 41.16 of which are lost. Proposed habitat creation on site will provide +68.87 units. Habitat enhancement on site provides +12.63 units. Post development units on site are therefore 81.50 units. This is a net change of +32.64 habitat biodiversity units, which is an on-site gain of 66.79%.
- 7.62 The total on-site net change is therefore +32.64 units or a 66.79% increase.
- 7.63 The proposals are therefore in accordance with Policies NH/4 and NH/6.

Landscape and Townscape

- 7.64 Following detailed analysis of the ZTV plans and an initial scoping survey, eighteen viewpoints were selected to represent typical views from potential receptors at varying distances and orientations from the Site.
- 7.65 The LVIA identified that the proposed development will result in one residual, significant adverse visual effect associated with the visual experience of ramblers from the Public Right of Way to the east of the Site (viewpoint 8), when assessed against the baseline of the existing site condition. However, the articulation of the architectural volumes and careful consideration of the cladding materials, including new planting, would provide some mitigation of the visual effects, and views of the proposal would also be filtered by the proposed trees on the proposed eastern road ('Cowley Road East') when they reach semi-maturity. It is also noted that the proposals comprise high quality architecture, which would contribute to the visual amenity of the view.
- 7.66 In terms of landscape and townscape effects, the LVIA concluded that the proposed development does not result in any significant effects, even when assessed against the baseline of the existing site condition. The evolution of the master plan considered the sensitivities highlighted in the LVIA process, resulting in a proposal that appropriately responds to its context. Nonetheless, it is noted that the sensitivity of the eastern edge of the Site is sufficient to give rise to moderate adverse effects on the landscape setting of the Fen Ditton CA, aligned with the significant effects on receptors at viewpoint 8. However, these effects should be read in conjunction with the lack of adverse visual effects on viewpoints 5 and 24, indicating that the change in townscape terms is not perceived equally across this landscape receptor. As a result, the effect on the landscape setting of the Fen Ditton Conservation Area is not considered to be significant.
- 7.67 The LVIA concluded that, overall, the proposal is largely appropriate to the urban context and the testing of long distance views did not result in any significant effects on the Cambridge skyline. The proposal responds sensibly to the residential edges and existing tall buildings, includes positive landscape spaces and proposes architectural technologies that align with the concept of high-quality design. As such, the proposed development is considered to represent a positive contribution to the evolving railway corridor, which is an important townscape character for Cambridge and the experience of the numerous visitors to the city.
- 7.68 In light of the above, the scheme complies with Policy NH/2.

Heritage

- 7.69 Local Plan Policy NH/14 states that development proposals will be supported when they sustain and enhance the significance of heritage assets, including their settings, as appropriate to their significance and in accordance with the Framework. This includes designated and non-designated heritage assets. The supporting text at paragraph 6.49 to Policy NH/14 sets out the need to carry out a balancing exercise. This is consistent with the Framework. The Appellant has completed the balancing exercise and found that the benefits outweigh the harm by a considerable margin.
- 7.70 A total of 23 heritage assets and 19 heritage viewpoints within the LVIA were scoped in and assessed to consider the potential heritage impact of the proposed development at Cambridge

North. The proposals have therefore been underpinned by an understanding of the significance of those heritage assets potentially affected in line with Framework paragraph 194 and the staged approach to assessment of setting set out in HE GPA 3.

- 7.71 The assessment undertaken through the Cultural Heritage Statement and the ES Cultural Heritage Chapter has concluded that there will be no significant impact on the historic environment in the vicinity of the Site as a result of the proposals. Non-significant impacts are also limited to only two conservation areas (Fen Ditton Conservation Area and the Riverside and Stourbridge Common Conservation Area); there is no impact on the other conservation areas assessed, nor any of the listed buildings, scheduled monuments or the Anglesey Abbey Registered Park and Garden.
- 7.72 The non-significant impact to the two conservation areas is considered to result in 'less than substantial harm' in Framework terms, and at the very lowest end of this scale.
- 7.73 In accordance with Framework paragraph 202, this harm should then be weighed against the public benefits of the proposal. The public benefits of the development proposal are set out later in this section of this Statement and are very great.
- 7.74 The proposals are considered to contribute positively to local character and distinctiveness as they have drawn on the contribution made by the surrounding historic environment to shape the character of this new emerging area of Cambridge. They have also been carefully designed to respond to the heritage context in order to sustain the special character and distinctiveness of Fen Ditton and the river corridor area of Cambridge in particular. They will create a new high-quality environment with a strong sense of place and are therefore considered to be in accordance with Policy NH/14.

Climate Change

- 7.75 The proposed development will deliver a scheme with BREEAM 2018 Excellent certification as a minimum, with an aspiration to target 'Outstanding' as the design develops. All offices will be designed to target an EPC rating of A. LETI 2025, or LETI 2030 targets for in-use emissions in residential buildings will be targeted.
- 7.76 In addition to the above, the Design and Access Statement confirms the important role of the development in enhancing the health and wellbeing of residents and workers and careful consideration has been given to the orientation and shading requirements of buildings.
- 7.77 The proposals are therefore in accordance with policies CC/1, CC/3 and CC/4.

Environmental Impact Assessment

- 7.78 The Appellant prepared an Environmental Statement in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

- 7.79 The ES was prepared in accordance with Scoping Opinion 21/05178/SCOP. The ES considers the likely significant effects of the proposed development during its construction and once it is complete and operational.
- 7.80 The resultant assessments have been carried out, as agreed with the LPA and its consultees, for the following environmental topics:
- Air Quality;
 - Climate Change;
 - Cultural Heritage;
 - Ecology;
 - Flood Risk and Drainage;
 - Human Health;
 - Landscape and Visual;
 - Lighting;
 - Noise and Vibration;
 - Socio-Economics;
 - Soils and Groundwater;
 - Transport;
 - Wind; and
 - Cumulative Impacts.
- 7.81 Table 20.1 of the ES provides a summary of the mitigation measures proposed as a result of the assessment process for each of the environmental topics, which can be implemented either through planning conditions or a planning obligation.
- 7.82 A Statement of ES Conformity was submitted alongside a formal resubmission to ensure that the assessments and conclusions in the ES remain valid.

Summary of compliance with the development plan

- 7.83 The development is in accordance with the development plan. It therefore benefits from the “presumption in favour of sustainable development” as set out at paragraph 11 of the Framework and should be approved “without delay”.

Other Material Considerations

- 7.84 Notwithstanding the conclusions in respect of the development plan, other material considerations that are relevant to the determination of the planning application should be considered. These support the conclusions that planning permission should be granted.
- 7.85 Relevant material considerations in this case comprise the following:

- National Planning Policy Framework (2021)
- The emerging policy position and its evidence base
- The benefits of the proposal.

National Planning Policy Framework (2021)

- 7.86 Paragraph 11 of the Framework states that “*plans and decisions should apply a presumption in favour of sustainable development*”. This means “*approving development proposals that accord with an up-to-date development plan without delay*”.
- 7.87 The Framework states that there are three dimensions to sustainable development: economic, social and environmental (paragraph 8). The application fully delivers all three dimensions to sustainable development. This is set out in full in the supporting Planning Statement for the application.
- 7.88 Fundamentally, the development responds to the Framework’s requirement that development makes the most effective use of land. In this respect, the Framework outlines that: “*planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses*” (paragraph 119). The Appeal scheme promotes the effective re-use of land that is designated for wholesale regeneration.
- 7.89 Furthermore, the Framework states at paragraph 120 that planning should “*promote and support the development of under-utilised land and buildings*”, with paragraph 124 adding; “*planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it*”.
- 7.90 Opportunities for densification of existing urban areas in locations well served by public transport should be maximised wherever possible. The Site is served by excellent public transport infrastructure and therefore presents a significant opportunity to transform into a high quality gateway to the city and act as a catalyst for the regeneration of the wider NEC AAP area.
- 7.91 Finally, reflecting the requirements of the Framework paragraph 132, the scheme is the result of extensive consultation with the community, the LPA, the Cambridgeshire Quality Panel and the Disability Panel. The Appeal proposals represent a well-considered, high-quality design which reflects and responds to local context. The design promotes high levels of sustainability.

The Emerging Policy Position and its supporting evidence base

Emerging NEC AAP

- 7.92 As referred to in Section Five, it is the Appellant’s view that the emerging NEC AAP remains at an early stage in its preparation, is subject to a number of significant unresolved objections, and is entirely dependent on the outcome of an uncertain DCO process and, therefore, can only be afforded very limited weight in the determination of planning applications.

7.93 The Councils have published a number of evidence papers to support the draft policies and proposals of the Proposed Submission version of the emerging NEC AAP, together with a series of non-statutory Development Management Guidance documents. This evidence base is also subject to objection from landowners within the AAP boundary including the Appellant and has been subject to limited or no consultation. As such, it is the Appellant's view that the AAP evidence base documents and Development Management Guidance also have very limited weight in the determination of planning applications.

Emerging Greater Cambridge Local Plan

7.94 Cambridge City Council and the LPA are working together to create a new joint Local Plan for the two areas – referred to as Greater Cambridge.

7.95 It is acknowledged that the emerging Joint Local Plan is at a very early stage (Regulation 18 Preferred Options) so, while very limited weight should be attached to it in the determination of this Appeal, it provides useful background on the direction of travel locally. The following is relevant to the development proposals;

- **The Cambridgeshire and Peterborough Independent Economic Review ["CPIER"] (2018) and the Cambridgeshire and Peterborough Industrial Strategy (2019)** – these provide ambitious plans for growth over the next 20 years. This is compounded by the Cambridgeshire and Peterborough Combined Authority ["CPCA"] setting a target of doubling the regional economic growth (GVA) over the next 25 years;
- **The Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020)** – this confirms that there is very little vacancy of a suitable type across industrial or office markets within the North East Cambridge submarket. This contrasts against strong corporate office market demand and Research & Development demand in the area, with the Cambridge North Station's accessibility as a particular local driver for demand. The emerging plan notes that knowledge-based clusters are identified as key to Greater Cambridge's role as the engine for economic growth. The study explores the characteristics of each key economic cluster including the challenges and opportunities that they currently face.
- **The Greater Cambridge Employment and Housing Evidence Update (January 2023)** – this confirms that demand for labs has reached an all time high with significant capital available for life sciences research but there is severe shortage of available lab move in space. Immediately available space has fallen to almost zero against this background of high demand. For offices, there is still good demand from businesses wishing to locate in central and north Cambridge in high quality premises, and this trend is expected to continue.

7.96 The Greater Cambridge Local Plan : Development Strategy Update (Regulation 18 Preferred Options) (January 2023) prepared by the Greater Cambridge Shared Planning service confirms the development strategy for the new joint Local Plan. At paragraph 4.3.1 it states that North East Cambridge, of which the Site forms part, is '*identified in the First Proposals strategy as the most sustainable location for strategic scale development available within Greater Cambridge*'.

The benefits of the proposal

- 7.97 Practice guidance sets out that “public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework” at paragraph 8. It states that “public benefits should flow from the proposed development” and “be of a nature or scale to be of benefit to the public at large and not just be a private benefit.” [NPPG,18a-020-20190723].
- 7.98 The benefits of the development proposal are therefore structured around the three elements of sustainability as set out within the Framework and Guidance. These are set out in full in the supporting Planning Statement for the application and listed in the table below.
- 7.99 The table below summarises the weight of the benefits attributable to the development. A scale for weight (in ascending level of benefit) has been used of: Slight, Limited, Moderate, Considerable, and Great.
- 7.100 Overall, it is concluded that the benefits of the scheme should be afforded very great weight. The beneficial impacts are summarised in Table 1 as follows:

SUMMARY OF BENEFIT	WEIGHT TO BE APPLIED
Economic	
Need for Offices, Labs and R&D space	Great
The ‘cluster’ Effect	Considerable
Additional Employment	Considerable
Social	
Housing Need	Considerable
Public Realm and Open Spaces	Considerable
Amenity and Meanwhile Uses	Moderate
Wellbeing and Social Inclusion	Moderate
High Quality Architecture	Great
Environmental	
Making effective use of land	Considerable
Accessible and sustainable location	Great
Response to the climate emergency	Great
Response to the biodiversity emergency	Considerable
CUMULATIVE TOTAL	VERY GREAT

Table 1: Summary of the benefits of the proposal

Planning Balance and Conclusion of Section Seven

- 7.101 In conclusion, the development is in accordance with the development plan. It benefits from the ‘presumption in favour of sustainable development’ as set out at paragraph 11 of the NPPF (2021) and should be approved “without delay”.
- 7.102 The supporting text to Policy NH/14, at paragraph 6.49, sets out the need to balance public benefits of the proposal against the harm. The development would provide substantial economic and significant social and environmental benefits. These would, by a considerable margin, outweigh any harm.

8.0 Conclusions

- 8.1 The proposed development accords with the development plan and therefore benefits from the 'presumption in favour of sustainable development' set out in Government policy.
- 8.2 To the extent that matters cannot be agreed in the statement of common ground, the Appellant will produce expert evidence on: masterplanning and architecture, landscaping and open space, heritage, landscape and visual, highways, office and lab supply, economic benefits and planning.
- 8.3 The Appellant reserves the possibility of calling expert evidence 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.
- 8.4 The Appellant proposes to enter into a Section 106 obligation to ensure that the appropriate planning obligations for the appeal scheme can be secured by the LPA.
- 8.5 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).

APPENDIX 1

POLICY MATRIX – THE EMERGING NEC AAP

POLICY	RESPONSE
Policy 1: A Comprehensive Approach at North East Cambridge	See Sections 6 and 7 of the Planning Statement. The proposals are considered as the catalyst for the delivery of the wider objectives of the AAP, while the proposed development has been carefully considered to align with its wider context.
Policy 2: Designing for the Climate Emergency	The principles of sustainable design and construction are clearly integrated into the development proposals. The method of achieving this is set out in Chapter 7 of the ES. In addition, a Sustainability Statement, Energy Statement and Energy Strategy have been submitted as part of the planning application. This is proportionate and reasonable in the context of this Appeal.
Policy 3: Energy and Associated Infrastructure	An energy strategy has been prepared to accompany the application. This includes considerations of more efficient heat pumps, optimising the design of roof spaces and helping reduce peak demands on the electricity grid. This is proportionate and reasonable in the context of this Appeal.
Policy 4a: Water Efficiency Policy 4b: Water Quality and Ensuring Supply	<u>Policy 4a</u> The scheme has been prepared in line with existing local planning policy which is to facilitate achieving the goal of <110 litres/person/day. Further testing will be completed during the Technical Design stage which is an opportunity to further increase water efficiency and seek to align with the objectives of emerging policy. This is proportionate and reasonable in the context of this Appeal. <u>Policy 4b</u> Consultation has taken place with the Cambridge Water Company (CWC), as the statutory provider of potable water for the area, and the existing point of connection on Cowley Road has been made through the Multi-Utility Contractor and this will provide the sufficient water to the Site. CWC has confirmed capacity for the appeal proposal, the onsite network being designed with T points for future road crossings, hydrants and building connections. CWC will also provide the water meters for each building and demise as required. Please see the Water Resources Addendum for more information.

<p>Policy 4c: Flood Risk and Sustainable Drainage</p>	<p><u>Policy 4c</u> A Flood Risk Assessment (FRA) and comprehensive surface water drainage strategy has been submitted as part of the planning application. Please see Chapter 10 of the Environmental Statement for more information.</p>
<p>Policy 5: Biodiversity and Net Gain</p>	<p>The proposed development incorporate a biodiversity net gain of 66.79%, far in excess of the 20% uplift targeted in Policy 5. The proposals are not considered to impact adversely upon any nearby ecological assets.</p>
<p>Policy 6a: Distinctive Design for North East Cambridge Policy 6b: Design of Mixed-Use Buildings</p>	<p>The Proposed Development comprises high quality architecture and is considered to represent a positive contribution to the evolving railway corridor.</p> <p>The Appellant has engaged with the Cambridgeshire Quality Panel throughout the pre-application process.</p> <p>A full explanation on how the scheme has responded to landscape, heritage, ecology and visual impacts is provided in the LVIA, Heritage and Ecology Chapter of the ES plus commentary in Appendix 4 of the Planning Statement.</p> <p>The proposal has maximised opportunities to create active ground floor uses.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 7: Creating High Quality Streets, Spaces and Landscape</p>	<p>Streets and public spaces within the Site have been designed to create a safe, walkable district, with high quality and well-connected pedestrian, cycle and public transport routes that support healthy, active lifestyles whilst effectively allowing servicing and deliveries and as well as managing access by private motor vehicles. The proposed buildings and public spaces have also been designed to be fully accessible for those with limited mobility or other impairments. Please see the Access Statement submitted with the planning application, prepared by David Bonnett Associates, for more information.</p> <p>Microclimate considerations have been undertaken as part of the Lighting chapter of the ES.</p> <p>Refer to the Design and Access Statement and Landscape and Open Space Strategy for further details.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>

<p>Policy 8: Open Spaces for Recreation and Sport</p>	<p>The scheme has been prepared to align with the informal open space and children’s play space requirements based on the Local Plan standards. Provision of sports facilities will be met off-site.</p> <p>Furthermore, the development will additionally deliver a series of dynamic and coordinated streetscapes and substantial areas of public realm that are attractive, well-designed and accessible and inclusive.</p> <p>These spaces will form a comprehensive, high quality landscape, that integrates with the proposed new residences, amenity uses and commercial accommodation and create a successful new urban quarter.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 9: Density, Heights, Scale and Massing</p>	<p>A comparison of heights against Figure 21 of the AAP is carried out in the DAS at page 109. The AAP heights figure is very diagrammatic which does not make easy comparison with the Appeal scheme. In many areas the Appeal scheme is consistent but in a number of areas it is not. A full explanation is provided in the LVIA and Heritage Chapter of the ES plus commentary in Appendix 4 of the Planning Statement.</p> <p>Paragraph 119 of the Framework promotes an effective use of land in a way that makes as much use as possible of previously-developed or brownfield land. The planning statement emphasises the benefits of optimising development in this location and identifies the relative lack of harm arising.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 10a: North East Cambridge Centres</p>	<p>A mix of residential and employment uses are proposed. The quantum of employment uses responds to evidence in the Employment Land and Economic Development Study 2020 which confirms there is a lack of R&D and office space within North-East Cambridge.</p> <p>The location and quantum of retail and leisure units has been fully considered and informed by Bidwells’ leisure and retail team to ensure the buildings are designed in such a way as to be flexible across the Class E uses. In addition and as part of the proposed meanwhile use strategy, pop-up shops/workspace, food van, outside leisure uses can be introduced at different stages as buildings and open spaces come forward.</p> <p>Paragraph 119 of the Framework promotes an effective use of land in a way that makes as much use as possible of previously-developed or brownfield land. The planning statement emphasises the benefits of optimising development in this location and identifies the relative lack of harm arising.</p>

	<p>This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 10d: Station Approach</p>	<p>Station Approach Local Centre falls within the Site.</p> <p>The proposals have been crafted to broadly align with the design and development requirements for Station Approach Local Centre.</p> <p>In terms of quantum of uses, these have been fully considered and informed by Bidwells leisure and retail and commercial teams. Further commentary is provided in the Retail and Leisure Market Update and the Occupational Needs Report submitted with the planning application.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 11: Housing design standards</p>	<p>The proposals have been designed in accordance with the adopted local plan standards. The residential units will also meet the Government’s Technical Housing Standards (or any future equivalent).</p> <p>Amenity, privacy and other development factors have been considered and mitigated to avoid significant harmful effects on residents. This includes maximising the provision of dual aspect dwellings.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 12a: Business</p>	<p>The Employment Land and Economic Development Study 2020 (ELEDs) confirms there is a lack of R&D and office space within North-East Cambridge. This report was produced before the emphasis now placed on the life sciences sector created by the Pandemic and blind to the acute shortfall of offices and labs within the City and SCDC. Furthermore, the national importance of the Cambridge-based knowledge economy has been recognised.</p> <p>The Bidwells occupational market report in support of the application confirms the supply of laboratory floorspace is acutely constrained. With no new purpose-built lab supply for 2+ years occupiers are being forced to consider how they scale their businesses in the Cambridge cluster.</p> <p>The development responds to the pressures on Greater Cambridge’s local office and R&D market by providing new state of the art office and R&D stock in a highly connected and sustainable location which has been identified as suitable for such space through the preparation of a development plan document. Providing additional space in a supply constrained market will help facilitate the attraction of new national and international firms to Cambridge.</p> <p>Paragraph 119 of the Framework promotes an effective use of land in a way that makes as much use as possible of</p>

	<p>previously-developed or brownfield land. The planning statement emphasises the benefits of optimising development in this location and identifies the relative lack of harm arising. While the proposed quantum of commercial floorspace (53,700 sqm) exceeds the indicative 23,500 sqm for Chesterton Sidings referenced in Policy 12d, the quantum of commercial floorspace is considered proportionate and reasonable in the context of this Appeal.</p>
Policy 13a: Housing Provision	<p>The proposal secures an appropriate mix of housing on Site and contributes to the creation of inclusive, mixed and balanced communities.</p>
Policy 13b: Affordable Housing	<p>The proposals provide for 40% of the market homes to be delivered as affordable housing and 20% of the built to rent homes to be delivered as affordable private rent.</p>
Policy 13c: Build to Rent	<p>270 of the 425 homes are proposed as Build to Rent. The homes meet the requirements as set out in the Greater Cambridge Housing Strategy Annex: Build to Rent (2021)</p>
Policy 14: Social, community and cultural infrastructure	<p>The development proposals are supported by an appropriate provision of community uses to support the needs of the development.</p> <p>The location and quantum of retail and leisure units has been fully considered and informed by Bidwells' leisure and retail team to ensure the buildings are designed in such a way as to be flexible across the Class E uses. In addition and as part of the proposed meanwhile use strategy, pop-up shops/workspace, food van, outside leisure uses can be introduced at different stages as buildings and open spaces come forward.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>
Policy 15: Shops and Local Services	<p>The flexible Class E and Class F floorspace (5,353m²) proposed at ground floor level (excluding Class E (g) (iii)) exceeds the indicative retail capacity of the Station Approach Local Centre, listed in Policy 15 as 1,200m².</p> <p>While the proposed development departs from this draft policy, the quantum of retail uses and local services is considered proportionate to serve the proposed development and to contribute towards successful place-making.</p>

<p>Policy 16: Sustainable Connectivity Policy 17: Connecting to the wider network</p>	<p>The development facilitates travel by active and sustainable modes within and across the wider area. The Site is in an optimal location for sustainable transport modes given its proximity to Cambridge North train station and established high-quality pedestrian and cycle links. Given the accessibility of the location, the residential development element is proposed as car-free.</p> <p>The Appellant is liaising with the LPA and County Council regarding the nature, scale and phasing of planning obligations relating to off site transport improvements.</p> <p>Further explanation is provided in the Transport Chapter of the ES.</p>
<p>Policy 18: Cycle and Micro-mobility Parking</p>	<p>The development will include for extremely low levels of car parking, within the identified trip and parking budget, and the Appellant will be working closely as part of the travel planning with the new tenants to make full use of the existing alternative modes.</p> <p>Clear justification is provided in the Transport Assessment for the level and type of cycle parking infrastructure proposed to demonstrate it will meet the trip budget.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 19: Safeguarding for Cambridge Autonomous Metro and Public Transport</p>	<p>It is acknowledged that the proposed safeguarding land for CAM is indicative at this stage. However, as it is currently shown in figure 40, the shaded area is wholly Network Rail owned land including Network Rail's station lease area and operational railway land. Any proposed safeguarding of the land would need to be agreed with Network Rail and further engagement with Network Rail is required on this matter as and when it progresses. Since the draft NEC AAP policy was prepared, the CPCA has suspended all work on development of the CAM.</p>
<p>Policy 21: Street Hierarchy</p>	<p>The proposal has been designed to manage vehicle movements in accordance with the street hierarchy shown in Figure 42 and the design principles of the AAP. The residential quarter is a proposed car-free zone.</p> <p>This is proportionate and reasonable in the context of this Appeal.</p>

<p>Policy 22: Managing Motorised Vehicles</p>	<p>As demonstrated at Table 5.8 of the Transport Assessment submitted with the planning application, the proposals are forecast to operate within the draft vehicle trip budget assigned to the Site, with a 'headroom' level of trips remaining in both directions in both AM and PM peak hours.</p> <p>Despite operating within the vehicle trip budget, and being located in an already highly accessible location, a package of additional measures is proposed to facilitate trips to and from the site by sustainable modes of transport and to further support the low car strategy proposed for the development.</p> <p>This is proportionate and reasonable in the context of this planning application.</p>
<p>Policy 23: Comprehensive and Coordinated Development</p> <p>a. The proposal demonstrates the development will make an appropriate and proportionate contribution to site wide infrastructure such as road and rail crossings, and open space provision, to be secured through the use of planning contributions in accordance with Policy 27.</p>	<p>As detailed within Section 9 of the Planning Statement, appropriate contributions towards site-wide infrastructure are proposed as part of the development.</p>
<p>b. The proposal is supported by a comprehensive masterplan - accompanied as necessary by parameter plans in relation to layout, scale, appearance, access and landscaping - that accords with the overarching Area Action Plan Spatial Framework and other Area Action Plan policies, including, where appropriate: i. The ability to connect and contribute to Area Action Plan-wide utilities and communications grids; and ii. The setting aside of land for strategic and site-specific infrastructure provision.</p>	<p>The proposals are supported by a comprehensive masterplan and suite of parameter plans.</p> <p>The Utilities Statement submitted with the planning application demonstrates how the proposals will connect with existing site infrastructure.</p>
<p>c. Through the masterplan, applications should demonstrate how the proposal:</p> <p>i. Contributes proportionally to the achievement of the vision and strategic objectives for North East Cambridge and the creation of place;</p> <p>ii. Integrates, connects and complements successfully with the existing and proposed surrounding context, including areas beyond the boundary of North East Cambridge, and supporting the timely delivery and optimised approach to the phasing of</p>	<p>The proposed development has been carefully considered with local stakeholders for many years with a view to creating an exemplary new commercial and residential quarter in Cambridge, in accordance with the objectives of the wider North East Cambridge masterplan. Please refer to the Statement of Community Involvement for further information regarding this engagement with local stakeholders.</p> <p>The masterplan is landscape-led, as demonstrated by the detailed landscaping proposals submitted with the planning application.</p> <p>As demonstrated within the Transport Assessment submitted with the planning application, the proposals will maximise opportunities for sustainable transport modes given its</p>

<p>development across North East Cambridge;</p> <p>iii. Is landscape-led with respect to layout and access and design-led with respect to capacity, scale and form;</p> <p>iv. Will achieve and secure the required modal shift in accordance with the North East Cambridge Transport Study and Policy 22: Managing motorised vehicles , including the management of vehicle numbers, movements, servicing and parking, including throughout the construction phase of delivering the masterplan;</p> <p>v. Responds to the impacts of climate change;</p> <p>vi. Contributes to biodiversity net gain;</p> <p>vii. Successfully mitigates environmental constraints; and</p> <p>viii. Where relevant, has regard to the existing site circumstances, including the existing character, neighbouring uses and constraints; implementing the Agent of Change principle to ensure the ongoing functioning and amenity of existing uses is not materially affected.</p>	<p>optimum location and connectivity. The Construction Environmental Management Plan submitted with the planning application demonstrates how any adverse amenity impacts during construction will be minimised and mitigated.</p> <p>The Sustainability Statement submitted with the planning application demonstrates how the schemes proposes to minimise its carbon production wherever possible, while maximising renewable energy generation and sustainable construction methods. Please refer to Chapter 7 of the ES (Climate Change) for further information.</p> <p>A Biodiversity Net Gain of 66.79% is proposed, while the masterplan has been sensitively designed to mitigate environmental impacts and minimise amenity impacts upon neighbouring uses, such as views from nearby Conservation Areas.</p>
<p>d. The proposal accords with the relevant policies contained in this Area Action Plan or the adopted Local Plan(s)</p>	<p>See Section 6 of the Planning Statement.</p>
<p>e. In instances where the infrastructure provision is to be phased, either strategic or site-specific, an approved phasing strategy is in place;</p>	<p>A proposed phasing strategy is outlined within the Construction Environmental Management Plan submitted with the planning application.</p>
<p>f. The application is supported by a Statement of Community Involvement detailing the engagement with the Councils, surrounding landowners, occupiers and the local community on both the masterplan, phasing strategy, and development proposal.</p>	<p>A Statement of Community Involvement has been submitted with the Appeal.</p>

<p>Policy 25: Environmental Protection</p>	<p>The impact of the proposals upon the receiving environment have been carefully analysed and, where necessary, appropriate mitigation has been built into the proposed development. Please see the Environmental Statement for further information.</p>
<p>Policy 26: Aggregates and waste sites</p>	<p>The development proposal will not prejudice the existing use of the Aggregates railhead.</p>
<p>Policy 27: Planning Contributions</p>	<p>See Section 9 of the Planning Statement. This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 28: Meanwhile Uses</p>	<p>The proposed development has been designed to encourage spaces for meanwhile uses. Please see the Landscape and Open Strategy Report submitted with the planning application for information regarding the vision for meanwhile uses within the Site. This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 29: Employment and Training</p>	<p>Although the application is not accompanied by an Employment and Skills Plan (ESP) as required under Policy 29, employment, skills and training opportunities for local people will be provided in the construction phase of development and in the operational phase of the development, the details of which are set out in the Socio-Economics Chapter of the Environmental Statement and the Social Value Statement submitted with the planning application. This is proportionate and reasonable in the context of this Appeal.</p>
<p>Policy 30: Digital infrastructure and Open Innovation</p>	<p>Although the application is not accompanied by a Digital Infrastructure and Open Innovation Strategy as required under Policy 30, the scheme will secure appropriate provision of infrastructure suitable to enable the delivery of necessary media and broadband connectivity via appropriated worded conditions. This is proportionate and reasonable in the context of this Appeal.</p>



BIDWELLS