

Objection to 23/02685/FUL from the Friends of St Matthew's Piece

Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne Cambridge
CB23 6EA

Reference: 23/02685/FUL

To Greater Cambridge Shared Planning,

27 November 2023

Please upload, to the Documents section under 23/02685/FUL, this formal Objection to this proposal from the Friends of St Matthew's Piece. This should be labelled, on the planning portal listing, as from "Friends of St Matthew's Piece".

Our submission addresses interconnected issues. These culminate in the third, which is of greatest and most profound long-term concern. We focus throughout on both:

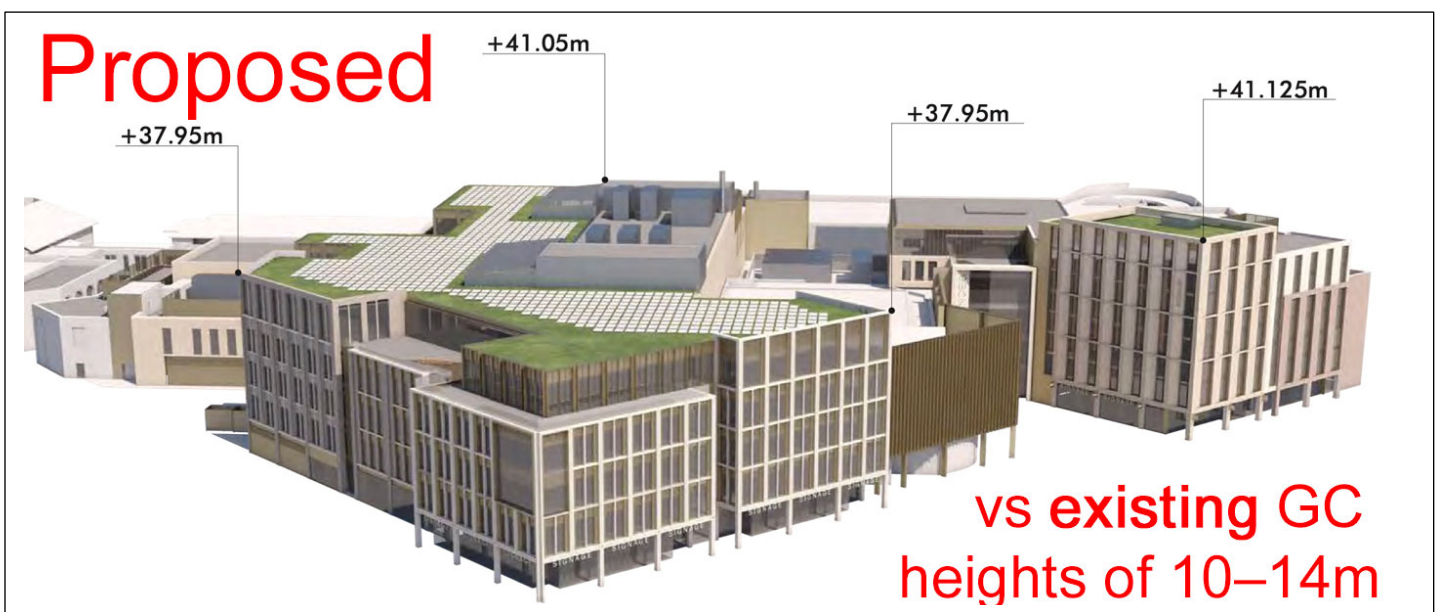
- the viability of St Matthew's Piece and its precious trees; and
- the wellbeing of our community as a whole.

1) EXCESSIVE SCALE & MASS OF 23/02685/FUL

23/02685/FUL is a dominating proposal that far from enhancing, actually harms the character of both the Kite Conservation Area and the Mill Road Conservation Area. 23/02685/FUL would overwhelm both Conservation Areas, as made clear in the views generated by the applicant.

1.1) THE ARCHITECT'S 3-D MODEL

The applicant's *Design & Access Survey* (p. 33) demonstrates the 'urban scale' of the existing "low level" Grafton Centre. It is much harder to find anything comparable for the **proposed** structure. Something finally appears in Appendix A of the applicant's *Landscape and Visual Appraisal – Appendix 5D – Technical Visualisations Type 4* (p. 80):



These colossal new structures are ~400% the height of the existing Grafton Centre buildings. Even these 40+ meter heights do not include the **flues** and **vents** that can loom 25% above these buildings – as has become clear from the Beehive application (23/03204/OUT).

The heights detailed in the model shown on p.33 of the applicant's *Design & Access Survey* highlight that even the tallest of the existing surrounding buildings – new and old – would be dwarfed by the structure proposed in 23/02685/FUL (see next page):

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- Abbeygate House **10.5m** tall – on East Road
- Christ Church **15m** tall – on Maid's Causeway
- Cambridge Crown Court **14m** tall – on East Road
- Compass House **10.5m** tall – on East Road
- Mallory House **14m** tall – on East Road

All of these buildings already loom over two Conservation Areas, that comprise mainly two-storey, largely Victorian, modest residential housing.

The extreme bulk and scale of the proposed commercial structures are blatantly at variance with the surrounding architecture. They would impose out-of-character views from many directions across Cambridge, including from and into the Kite and Mill Road Conservation Areas, as well as from sensitive Public Open Spaces.

The applicant's *Landscape And Public Realm* statement fails to mention that the proposed structures would look directly into the residential housing estate, on the opposite side of East Road. Views shown from the proposed structure's roof terrace reveal just how much the building will dominate the skyline from much of central Cambridge.

Consider just a few of the views generated by the applicant, bearing in mind that **none** of the residents with **these** impacted views in the Mill Road Conservation Area has been consulted.

1.2) SOME OF THE IMPACT ON MILL RD CONSERVATION AREA

From applicant's *Townscape And Visual Appraisal, Appendix 4, Technical Visualisations Type 3* we can see two versions of the proposed view from **Young Street**, which runs directly from St Matthew's Piece – the only public park in Petersfield. These two extracts illustrate some of the impact of 23/02685/FUL's proposed bulk on this part of the Mill Road Conservation Area:

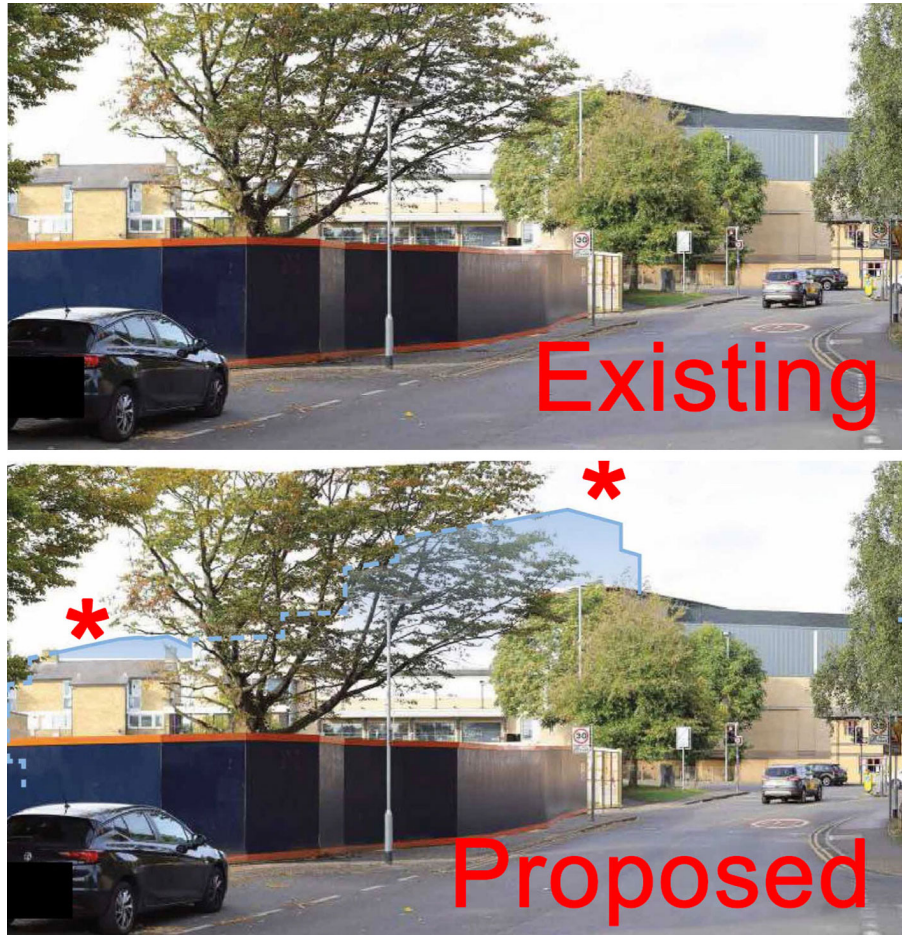
Applicant's 1st model of visual impact on Young Street, Petersfield (Mill Road Conservation Area)



See also 2nd version, next page.

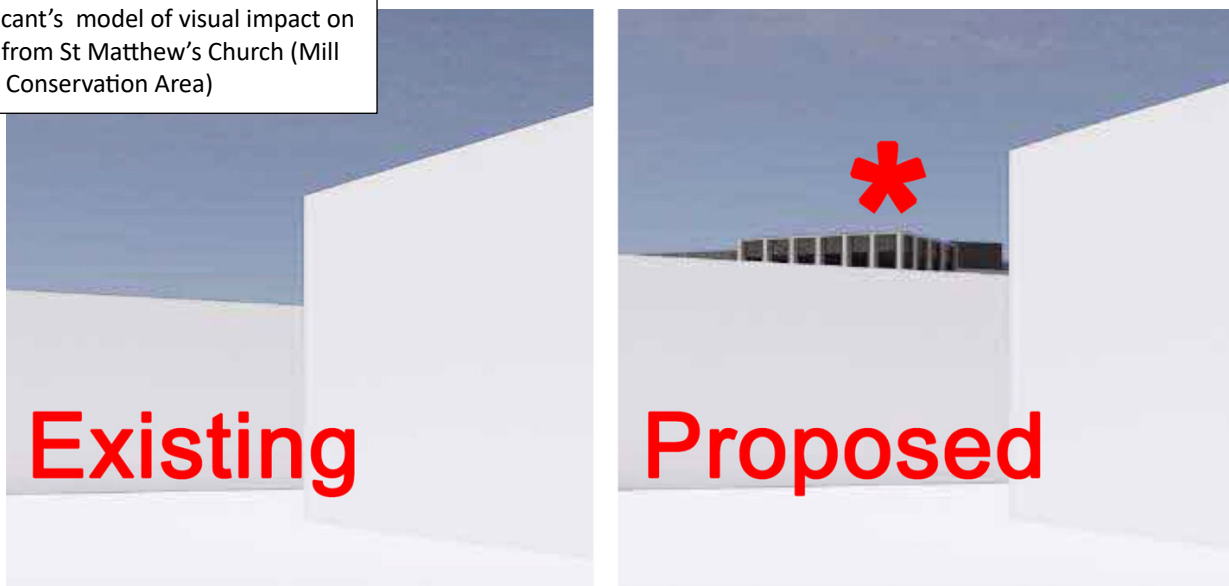
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Applicant's 2nd model of visual impact on Young Street, Petersfield (Mill Road Conservation Area)



Other nearby views from the Mill Road Conservation Area are also impacted, as shown in views provided in the applicant's *Townscape And Visual Appraisal, Appendix 4, Technical Visualisations Type 3*. The following is extracted from VPA4, and shows the impact on the view from St Matthew's Church, a listed building on St Matthew's Street. Its dedicated Reverend Hargrove was pivotal to the establishment of St Matthew's Piece, in the 1890s; this is a heritage site of great significance to the Friends of St Matthew's Piece. This would be the impact on the view from the church entrance:

Applicant's model of visual impact on view from St Matthew's Church (Mill Road Conservation Area)



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Other nearby views from within the Mill Road Conservation Area that are heavily impacted are shown in the applicant's *Townscape And Visual Appraisal, Appendix 4, Technical Visualisations Type 3*. The following is extracted from VPA6, and shows the proposed structures looming over the view from the Blue Moon pub, as well as from Norfolk Street, across from the same pub:



Here, from *Townscape And Visual Appraisal, Appendix 5C, Technical Visualisations Type 4* (pp 57–58) is another extract of the modelling of impact farther **east** on Norfolk Street, still in the Mill Road Conservation Area – also from addresses **never** consulted on 23/02685/FUL:

Applicant's model of visual impact on view from Norfolk St / St Matthew's Street junction (Mill Road Conservation Area)



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Once again, also from *Townscape And Visual Appraisal, Appendix 5C, Technical Visualisations Type 4* (pp 63–64) is another extract of the modelling of the visual impact from Norfolk Street above the housing estate **west** of the Blue Moon pub on Norfolk Street. This is a view from the Mill Road Conservation Area, as seen by more addresses **never** consulted on 23/02685/FUL:

Applicant's model of visual impact on view from near the western end of Norfolk St (also in the Mill Road Conservation Area)



1.3) SOME OF THE IMPACT ON KITE CONSERVATION AREA

The applicant's *Landscape And Visual Appraisal, Appendix 5D, Technical Visualisations Type 4* shows the impact on the adjoining Kite Conservation Area. Here we highlight an extract of the material on pp. 68–69, modelling of the visual impact as seen along Adam and Eve Street:

Applicant's model of visual impact on view along Adam-and-Eve Street (in the Kite Conservation Area); the pink asterisk highlights the visual impact including outlined "cumulative schemes"



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The applicant's *Landscape And Visual Appraisal, Appendix 5D, Technical Visualisations Type 4* shows the impact from the opposite side of the proposed development, still within the Kite Conservation Area. This highlights an extract of pp. 78–99, modelling of the visual impact as seen along Napier Street, adjacent to the 15m tall listed Christ Church on Maid's Causeway:

Applicant's model of visual impact on view along Napier Street (in the Kite Conservation Area)



1.4) IN BRIEF

The damaging visual impacts of this wholly commercial development fail to enhance and, instead, significantly **harm** the principally residential context of two Conservation Areas. Overshadowing and widespread overlooking will harm the setting, character and appearance of local housing and views of and from the Kite Conservation Area and the Mill Road Conservation Area, and impact negatively on Public Open Space. Consultation has **omitted** almost all of those affected by these harms that **breach Policies 46, 55, 56, 57, 58, 60 and 61.**

2) ENVIRONMENTAL HARM FROM 23/02685/FUL

The height and bulk of the proposed buildings in 23/02685/FUL, illustrated on the preceding pages would also disrupt local street-level wind and airflow patterns. Other negative environmental impacts are examined in more detail in this section of our Objection.

2.1) WATER

The impacts of the construction and long-term operation of this proposed high intensity development would have significant impacts on the water table. Development-driven over-extraction of aquifer water is already an acute crisis issue for Cambridge, as publicly and widely acknowledged by the Environment Agency.

The Environment Agency **objects** to 23/02685/FUL as follows (*emphasis supplied*):

This development has the potential to increase abstraction from groundwater sources. You should consider whether the water resource needs of the proposed development alone, and in-combination with other proposed development that

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the relevant water company is being asked to supply, can be supplied sustainably without adverse impact to WFD waterbodies and chalk streams. At the present time **we are unable to advise with confidence that further development will not harm the water environment**, until it can be shown sustainable water supplies can be provided.

The response from Anglian Water further states they do **not** have capacity for the site:
The full development may lead to an unacceptable risk of flooding and/or pollution

Such severe risks and harmful environmental stress must not continue to be ignored and flouted by the continued approval of excessive development that will exacerbate already unsustainable levels of water abstraction.

23/02685/FUL would further increase the existing severe water stress on all of the trees on St Matthew's Piece as well as the entire supporting local ecosystem. Cllr Sam Carling, Executive Councillor for Open Spaces and City Services was quoted in a City Council Press Release on 15/9/23 as saying:

Increasing our tree stock in the city and protecting existing trees – including veteran trees – are both critical to our Tree Strategy as a council.

2.2) AIR QUALITY

In the applicant's Air Quality Assessment submitted for 23/02685/FUL, the Overview Section (1.4.1) states that:

The assessment considers concentrations of NO₂ and particulate matter (PM10 and PM2.5) only, as these are the key pollutants of concern associated with road traffic in the study area.

This is asserted despite the *Air Quality Assessment* quoting CLP18 Policy 36 and the 'Sustainable Design and Construction' SPD in detail.

Section 2.3.3.4 of the *Air Quality Assessment* actually takes pains to make clear that both Policy 36 and the SPD **do require** an assessment of air quality with regard to **odour**, noting (emphasis supplied):

However, air quality will particularly be **a material consideration** where ...

- **any sources of emissions to air, odours and fugitive dusts generated** by the development are not adequately mitigated
- any impacts on the proposed use from existing poor air quality, odour and emissions are **not** appropriately **monitored and mitigated** by the developer.

Section 4.6 of the Air Quality Assessment also notes (emphasis supplied) that:
a review of the Environment Agency's public register found there to be no installation permits issued within 1km of the proposed development. As such, it is unlikely for there to be **any significant impacts** from industrial activities at the proposed development with regard to air quality

This Air Quality Assessment therefore **ignores** that the site is proposed to create 47,218 m² of "life science provision".

What *kind* of life science work would be done at this site? Could a laboratory doing work like that done in Wuhan before the Covid pandemic be sited here? What are the controls on activity?

Life science labs could be assaying blood, or experimenting with genetic modification, and might be using serious biohazards. Where is the information on what hazardous materials would be

- used by,
- emitted by,
- transported to,
- removed from (how?) this "life science provision"?

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Do Planning Committee Members and Planning Officers have adequate information on:

1. how leaks and spillages of hazardous materials would be handled?
2. plans for containment and evacuation of properties and schools (nursery, primary and secondary) at or near the site, in the event of a major incident?

Biohazards and airborne pollutants will be generated by almost *any* laboratory work, and then vented via fume cupboards into the air that all local residents will breathe. Particulate matter would then settle on surrounding lower-lying areas, including the East Road housing estate and St Matthew's School playground, on the opposite side of East Road. This could also impact the Community Orchard on Midsummer Common, where food is grown for public consumption.

A single serious **accidental** release from any of the laboratories operating within the 47,218 m² of "life science provision" proposed for this **central city location** could have significant ecological, economic and human consequences. Has the Council considered possible legal risks from this? In the case of *Primavera Associates Ltd v Hertsmere Borough Council EWHC [2022] 2685 (Ch)*, Mr. Justice Leech noted that a duty of care can arise in a case where the local planning authority had created a danger of harm which would not otherwise have existed. The judgement confirmed that local authorities owe a duty of care to the public.

Laboratory emissions are **never** mentioned in the *Air Quality Assessment* for 23/02685/FUL with its proposed 47,218 m² of life science provision. Nor are volatile fumes considered. The *Air Quality Assessment* **explicitly** ignores these (see Section 1.2, Objectives – *stress supplied*):
Assessment of the flues from the fume cupboard **have been scoped out of the operational assessment**. It is **assumed** that these flues will be correctly abated to prevent emissions to the air and therefore have **not been considered** as part of this assessment.

An Objection submitted in connection with the parallel Beehive Site planning application (23/03204/OUT) is highly pertinent also to 23/02685/FUL here. It warns of factors that would inevitably have an impact on air quality, although these are the very matters **excluded** from consideration in the *Air Quality Assessment* for 23/02685/FUL. This Objection stated:

As a scientist who has worked in wet labs in London, Cambridge and Boston USA, I find the idea to mix labs and housing so closely and at such high density to be ill-advised. I would not like to work or live on such a development.

The labs I have worked in have all contained flammable chemicals, human pathogens, pressurised gas cylinders, fume hoods venting out at the roofs, and produced hazardous waste as standard.

The operational waste management strategy document for the development is inadequate and appears unrealistic. It assumes that half of wet lab space will be writing up space. From experience, this is a major under-estimation of how much of the lab space will be maximised for use for 'wet' work and consequently that the waste generated is grossly underestimated. Ensuring that there is adequate provision for waste disposal should be fundamental to the planning of the proposed development. What other optimistic under-estimations do the plans make, risks un-mitigated or neglected?

With regard to Pollution, the Sustainable Design and Construction states (*emphasis supplied*):
3.6.146 To establish **whether** air quality impacts are acceptable, all large-scale major, small-scale major and minor planning applications... are **required to identify sources of emissions to air from the development** in the form of an Air Quality Statement.

The 2020 **Sustainable Design and Construction SPD** states in its **3.6.182**

Potential odour impacts/effects associated with new development can be a material planning consideration, as odours can have an unacceptable adverse impact/effect on amenity, quality of life and living conditions. ... The odour effect that the planning

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process needs to be concerned with is the negative adverse appraisal by and effect on a human receptor as a result of odour exposure.

The 2020 **Sustainable Design and Construction SPD** states in its **3.6.183**

Odours arising from industrial, trade or business premises can also be considered a statutory nuisance by local councils under the Environment Act 1990, if they unreasonably and substantially interfere with the use or enjoyment of a home or other premises. It is important to note that loss of amenity or disamenity does not equate directly to nuisance and significant loss of amenity will often occur at lower levels of odour exposure than would constitute a statutory nuisance. Nuisance is not intended to secure a high level of amenity but is a basic safeguarding standard intended to deal with excessive emissions. It is therefore important for the planning authorities to consider properly, loss of amenity from emissions in the planning process in its wider / broader context and not just from the narrow perspective of statutory nuisance.

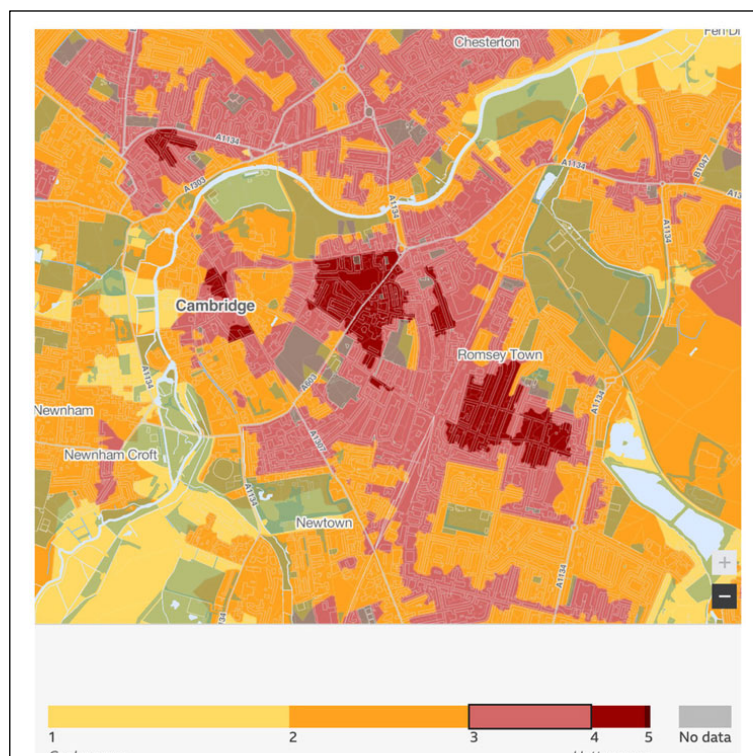
This proposal therefore **breaches Local Plan Policies 14, 36, 58, 59, 60, 61, 67 & 71** as well as numerous provisions of the 2020 **Sustainable Design and Construction SPD**.

3) URBAN HEAT ISLAND: INTENSIFICATION BY 23/02685/FUL

The proposals under 23/02685/FUL would significantly exacerbate the Urban Heat Island Effect that already afflicts both north Petersfield, in the Mill Road Conservation Area, and the Kite Conservation Area. The Grafton Centre proposals and the Beehive site proposals would **each compound** the effects of the **other**. They would increase the volume, bulk and thermal effects from the large buildings proposed for **both** nearby sites, amplifying the combined adverse consequences of each – for the health and wellbeing of thousands of local residents and their environment.

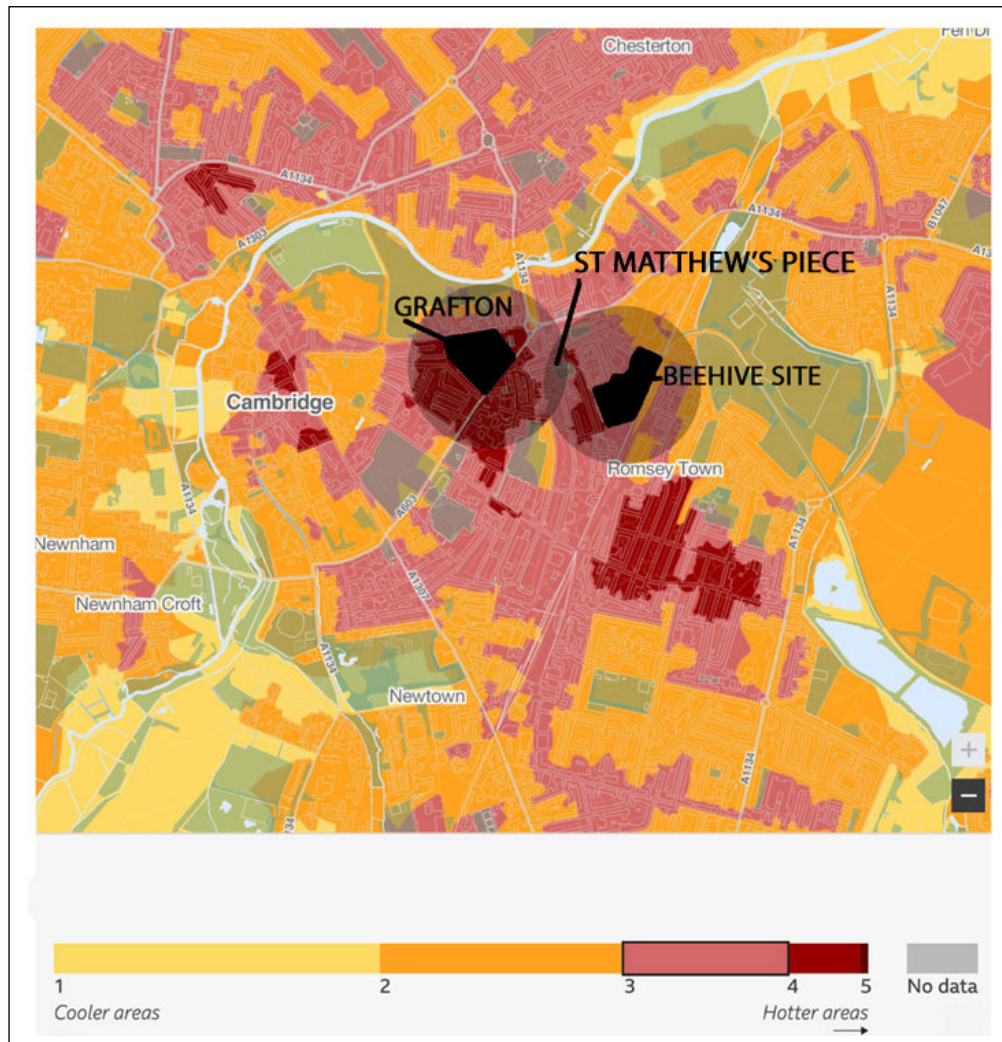
The image below was created using a tool published in 2022 on the BBC website (link available on request), for investigating Urban Heat Island Effects. This shows in red, the **existing** heat effects from the Grafton Centre and Beehive sites. Note the impact from the existing Grafton Centre and Beehive sites on the dense housing of North Petersfield near St Matthew's Piece:

This image was adapted to create the Figure on the next page.



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The next figure, adapted from that on the previous page, envisages the converged impact on St Matthew's Piece (and North Petersfield) of the **amplified and combined Urban Heat Island Effects** of the colossal development proposals now under discussion for both the Grafton Centre 23/02685/FUL and the Beehive site (23/03204/OUT):



This Objection from the Friends of St Matthew's Piece therefore highlights the **existing protections** against the Urban Heat Island Effect, afforded by both the 2018 Cambridge Local Plan and the Sustainable Development SPD.

Our Policy-based objections must be used by Planning Officers and Committee Members to ensure that both **the scale** of the proposals at both the Grafton Centre and the Beehive sites are **drastically reduced**, and that the **designs for both projects are fundamentally modified** in order to protect the health and wellbeing of local Cambridge residents and their environment.

3.1) CLP18 SECTION FOUR

Section Four of the 2018 Cambridge Local Plan focusses on 'Responding to Climate Change and Managing Resources'. Section 4.2 stresses that the "local plan will contribute to the achievement of sustainable development in terms of how the plan will address the challenge of mitigating and adapting to our changing climate, and other resource management issues." This is therefore *also* pertinent to our second Objection (Environmental Harm), above.

2018 Cambridge Local Plan Section 4.2 also emphasises the need for "ensuring that new developments and the wider community are adaptable to our changing climate". This acknowledges the risk of "an increase in the urban heat island effect (UHI) due to increasing

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temperatures" while seeking "to ensure that new development contributes to improvements in the environmental quality of Cambridge".

3.2) POLICY 28

This Policy explicitly asserts the need for the buildings such as those proposed under 23/02685/FUL, as for "All development", to "integrate the principles of sustainable design and construction into the design of proposals".

Development should involve "bespoke assessment methodologies to **assess the environmental impact of the proposals**" (stress supplied). The Friends of St Matthew's Piece formally request here a modelling of the Urban Heat Island Effect of the proposals for 23/02685/.

Note that Table 4.1 under Policy 28 states that, as an aim for "Climate change adaptation: All developments should be designed to be adaptable to our changing climate, both in terms of building design and their **wider landscape setting**" (stress supplied). How does 23/02685/FUL meet this requirement?

Table 4.1 also states that, as an aim for "Use of materials: All new developments should be designed to maximise resource efficiency and identify, source, and use **environmentally and socially responsible** materials" (stress supplied). An exacerbation of the Urban Heat Island Effect by 23/02685/FUL would be neither environmentally nor socially responsible.

Note further: Figure 4.1 under Policy 28 highlights the use of both 'stacked ventilation' and 'cool materials' to reduce heat gains; Figure 4.2 stresses the need for **design approaches to reduce excessive summer solar gain**. Where are these features in the plans for 23/02685/FUL?

Section 4.5 under Policy 28 stresses the importance of any application for development meeting the requirements of all other policies relating to sustainability throughout the 2018 Local Plan, including those pertaining to (for example): **biodiversity** and ecology; land, **water**, noise and air pollution; **health** and **well-being**, including **provision of open space**. How do the proposals under 23/02685/FUL **meet these requirements of Policy 28?**

So important are these considerations that Sections 4.8 and 4.9 under Policy 28 note, respectively that: "The Council will be supportive of innovative approaches to **meeting and exceeding** the standards set out in the policy"; and that "It may be possible in some areas for development to exceed the policy requirements set out above". It is becoming ever more *essential* for these standards to be implemented and enforced.

3.3) POLICY 29

Policy 29a provides a crucial level of protection from the harms caused by 23/02685/FUL. This says that proposals should **demonstrate** that

"any adverse impacts on the environment... have been minimised as far as possible"

(stress supplied).

If the Urban Heat Island Effects of 23/02685/FUL have not been fully modelled by the applicant, Policy 29a has not been met.

Policy 29b does allow a sympathetic view to be taken of proposals:

"where any localised adverse environmental effects remain, [where] these are outweighed by the wider environmental, economic or social benefits of the scheme".

Unless the Urban Heat Island Effects of 23/02685/FUL have been fully modelled by the applicant, it is **not possible** to form a balanced or valid judgement of the relative consequences of the proposals (deleterious vs beneficial).

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Furthermore, **Section 4.14 under Policy 29** expects applicants (emphasis supplied): "to have taken appropriate steps to **mitigate any adverse impacts** through careful consideration" of: "location, scale, design and other measures...; **cumulative impacts**; impacts on the landscape, the built environment, ... and biodiversity"

The Ecology Consultation Response on 23/02685/FUL (dated 28/08/23) highlights, for example "Species data shows great crested newt and other amphibians, barn owl and other breeding birds, flowering plants, invertebrates, stonewort, bats, otter, water vole, and hedgehog have all been recorded locally."

Note particularly the emphasis on "**cumulative impacts**" – bearing in mind that **both** 23/02685/FUL and 23/03204/OUT are **both** currently under consideration by the Planning Department, during autumn 2023.

3.4) SUSTAINABLE DESIGN AND CONSTRUCTION SPD

With further regard to cumulative impact, **Sustainable Design and Construction** SPD states in **Section 3.6.153**:

- A single development may have a very small impact on air quality, but many developments will, together, have a larger impact. For this reason it is important that:
- All developments, including minor developments, do not contribute to air pollution
 - The cumulative impact of all developments is considered

Unless the Urban Heat Island Effects *and* adverse Air Quality impacts of proposals under 23/02685/FUL have been fully modelled and evaluated, it cannot have been possible to take appropriate steps to mitigate adverse isolated or **cumulative** impacts of 23/02685/FUL (i.e., with 23/03204/OUT, also) on crucial and formally protected elements of our environment and communities.

With reference to **NPPF paragraphs 149 and 150**, the 2020 Sustainable Design and Construction SPD states in its Section 3.4.5

The NPPF is clear that planning has an important role to play in ensuring that new and existing communities are capable of adapting to our changing climate. It sets out that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, taking account the long-term implications of issues such as flood risk, coastal change, water supply, biodiversity and landscapes and the risk of overheating from rising temperatures.

IN CONCLUSION

In view of the protections stipulated by a wide range of policy guidance, as cited above (in the NPPF, the 2018 Cambridge Local Plan and in the 2020 Sustainable Design and Construction SPD), 23/02685/FUL must be wholly redesigned to significantly reduce the project's scale and mass – to eliminate dominance over (and adverse effects on) the two adjacent and proximate Conservation Areas, their adjacent residential communities, and our key Public Open Spaces.

Furthermore, every aspect of the project must be redesigned in order **specifically** to eliminate exacerbation by 23/02685/FUL, of Urban Heat Island Effects – including preventing **cumulative** adverse impacts on human health, the landscape, the built environment and on biodiversity.

Friends of St Matthew's Piece

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Posted on behalf of the Friends of St Matthew's Piece

Also submitted 27.11.23 via planning@greatercambridgeplanning.org