SOUTH PETERSFIELD RESIDENTS ASSOCIATION
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To: Toby Williams, Case Officers
Greater Cambridge Planning Services

21 July 2021

From: Edward Leigh

Planning application reference: 21/00264/FUL

South Petersfield Residents Association continues to **object** to the revised application for the development on Cambridge station car park (blocks B2 and F2) on the following grounds.

DAS = Design & Access Statement
NPPF = National Planning Policy Framework
MSCP = multistorey car park in block B2
CCLT = Cambridge City Licensed Taxis, permitted to use the station rank
S106 = Section 106 of the Town and Country Planning Act 1990 (as amended)
Previous (rejected) planning application reference: 18/1678/FUL

Summary of key points

- The height and mass of B2 is out of proportion to the buildings in Devonshire Rd, Devonshire Mews and F2.
- The convertibility of the multi-storey car park to cycle parking should be a planning condition.
- The proposed traffic management plan is an inadequate response to the station management company's long-term responsibility for managing taxi traffic to the station.
- The design of the Great Northern Road mini-roundabout should be adjusted to meet the needs of pedestrians, not motor vehicles.
- Vehicles making deliveries to One Station Square are dangerously oversized, possibly in breach of a planning condition that is not being enforced.

Block B2 height and mass

1) There remain concerns about the height and massing of B2 in relation to Devonshire Rd, Devonshire Mews and the Mill Road conservation area. Residents of Devonshire Rd do not feel that the changes made since the previous application adequately address the second reason for refusal:

   By virtue of the scale, massing and footprint of building B2 in close proximity to Carter Bridge and in regard of views from Devonshire Road, the proposed building would appear visually cramped, overly prominent and detract from the character and appearance of the existing area and setting of the adjacent Mill Road Conservation Area. The proposal is therefore contrary to policies 55, 56, 57 and 61 of the Cambridge Local Plan (2018) and NPPF (Feb 2019) paragraphs 124 and 196.

2) The applicant accepted the need to reduce the height of F2 significantly at the Devonshire Rd end to avoid creating an overbearing edifice. However, it has made only small

concessions in relation to B2, pulling it back 4.5m and stepping the top floor back. The edifice of B2 seen from the corner of Devonshire Rd (excluding the top floor and plant) is still 16m high, 6m higher than the edifice of F2 (see Figure 1).

3) The footprint of B2 still extends 7m north beyond the footprint of the outline planning consent (see Figure 2). Combined with the height and mass, the building will be an overbearing neighbour to residents of Devonshire Rd and Devonshire Mews.

Future-proofing of block B2

4) We appreciate the efforts made by the applicant to future-proof the multi-storey car park in B2, so that it may be converted to a cycle park at a future date.

5) Although the applicant has claimed that the conversion plan does not form part of the planning application, we ask officers to add a condition on any planning consent that requires:

   - A detailed conversion plan to be provided for filing with the planning documents for future reference.
   - The conversion plan to be independently verified by a qualified structural engineer that it is feasible without avoidable complications (e.g. having to reinforce structures or re-route services).
   - The conversion plan should be approved by the planning authority, with input from accessibility and safety auditors to confirm that the design is compliant with all current accessibility and safety principles.

6) Conditioning may be justified by the general planning obligation in the NPPF about "meeting the needs of the present without compromising the ability of future generations to meet their own needs." Furthermore, the Local Transport Plan requires provision of cycle parking "that meets demand," and the Local Transport Note 1/20 requires that, "Spare capacity should always be provided to cater for growth and turnover."

7) Failure to secure space for additional cycle parking long-term will undermine local transport policies and lead to fly-parking of cycles, causing obstructions around the CB1 site and neighbouring roads.

Taxi over-ranking

8) The issue of over-ranking taxis has still not been addressed satisfactorily. If CCLT taxis are unable to enter the taxi rank, they will block back to the entrance to the pick-up/drop-off area. That will cause more frequent and sustained congestion along Great Northern Rd and Tenison Rd. When queues back up to Station Rd, they disrupt bus services.

9) The applicant has claimed it is not its responsibility to regulate the queuing of taxis and that the current arrangement is only temporary. Although the arrangement long pre-dates the CB1 works, we acknowledge that the outline planning consent did envisage space for over-ranking being phased out. However, it also envisaged more spaces being available in the pick-up/drop-off area:

- 20 spaces in the taxi rank
- 8 taxi pick-up/set-down bays ***(These have not been provided)***
- 16 private vehicle pick-up/set-down bays
- 5 disabled parking bays *(In fact 7 have been provided)*
- 2 disabled drop-off bays

The Station Area Development Framework required space for 30 taxis. The outline planning consent compromised on 28 spaces. 16 were provided, with queuing space for 4 more. The reduction in allocated spaces most certainly contributes to the congestion on Great Northern Road. The solution is of course not to create more parking spaces. **However, the under-provision of spaces for taxis does leave the station management company (currently Abellio Greater Anglia) responsible for managing taxis that cannot be accommodated in Station Square.**

10) Congestion on Great Northern Rd has been shown to cause high levels of air pollution. Even if all CCLT- and Cambridge-licensed taxis were electric, most other vehicles travelling along Great Northern Rd will continue to be petrol- or diesel-powered for at least the next ten years. Therefore, any increase in congestion will be severely detrimental to the health of people living along this road.

11) There is also a problem of private hire vehicles waiting, often with their engine running, in nearby residential streets (Tenison Rd, Tenison Ave, Devonshire Rd, Mill Park) and also behind One Station Square. This situation would worsen if CCLT taxis also choose to wait close by when the station rank is full.

12) The applicant has indicated the solution is to reduce the number of taxi and private pick-up/drop-offs. This would indeed solve many of the problems in the station area. However, the applicant has offered only temporary measures to manage traffic during the construction period.

13) In any case, there will always be a need for CCLT taxi drivers to have advance information on when spaces will be available in the taxi rank, so that they do not enter Great Northern Rd too soon, and cause congestion. Currently this is achieved by a CCTV link-up to the over-ranking space in the car park. How will this be enabled in future?

14) We ask officers to add a condition on any planning consent that a long-term traffic management plan is developed and adopted with the binding agreement of all relevant stakeholders and approval of the planning authority. The plan must be practical and effective, with specific performance metrics and enforceable penalties. Any funding requirement, short- or long-term, must be covered by a contractual agreement.

Great Northern Rd mini roundabout

15) We are pleased that the applicant has accepted the need for a zebra crossing on the eastern end of Great Northern Rd. However, the crossing is now further off the desire line than the current informal crossing. (Note that the current crossing aligns with the lane through the car park; in future the pedestrian route will be in front of F2 – see Figure 4.)

16) Two alternative configurations suggested (see Figure 5 and Figure 7), which could potentially allow the crossing to be significantly closer to the desire line, and avoid congestion on the corner outside Sainsbury's.

17) The argument given by the applicant against doing this is that vehicle speeds could make this unsafe. The answer is not to inconvenience people walking, but rather to ensure that vehicles do not exceed a safe speed when exiting the station square. This can be achieved by, for instance, tightening the corner radius. Visibility is good as there are no structures obscuring drivers' view of pedestrians approaching either side of the pedestrian crossing (see Figure 8).

Footways

18) We are very pleased that the applicant has accepted our and Camcycle's recommendations to extend the northern footway under the Carter bridge (see Figure 3).

19) The pinch point in the footway along the west side of the Ibis café is exacerbated by the positioning of a lamppost and bollards (see Figure 10). This could be improved by affixing the lamp to the building or moving it to the other side of the Northern Access Road. We ask officers to include a condition on any planning consent to address this in the detailed design for this application.

Landscaping

20) We are pleased that the applicant will reinstate a planted screen along part of the north side of the footway (see Figure 3). We would like this to be extended as far towards Devonshire Rd as possible.

Miscellaneous issues

21) HGVs delivering to businesses at One Station Square are larger than the road geometry was designed for. There appears to be a lack of enforcement of planning conditions, which needs to be remedied permanently to (amongst other benefits) minimise the dangers for people cycling behind One Station Square.

22) The indicative cycle route behind One Station Square will require on-the-ground markings to ensure that a sufficiently wide space is kept clear at all times to ensure people can walk and cycle through space safely. This must to take into account the fact that parked vehicles, trailers and tents may obstruct views.

23) The access arrangements during the construction of B2 (see Figure 9) need to address in more detail:

    - How will people cycling access the Cyclepoint when construction vehicles are entering or leaving the site compound? There could be significant delays when large vehicles are manoeuvring.
    - How will the road outside the Cyclepoint will be kept clear of mud.

- The drawings show no pedestrian crossing points from the footway on the north-west corner of the mini-roundabout to the south (to replace the crossing that will be temporarily removed to create car access to the car park) or to the east.

24) Some S106 money was allocated for traffic mitigation in South Petersfield, most of which was spent on improvements to Tenison Rd. There is (we believe) some money left to create a pedestrian-friendly feature at the corner of Devonshire Rd (principally a raised table). Could the planning and highway departments ensure this is co-ordinated with the development, and that the S106 agreement for this development makes good any shortfall in the fund remaining to cover the works. We also request that SoPRA be involved in the design of the feature.

25) The pay-and-display parking bays on Great Northern Rd have a maximum stay of eight hours. It is unclear who these were intended to benefit, but they are filled most of the day, and therefore are unavailable to people visiting or delivering to residents of Great Northern Rd. We suggest that the County Council re-designate the remaining bays (after two are removed for the cycle lane) as loading and/or short-stay bays.

Relevant planning policies

Station Area Development Framework (April 2004)

Provide waiting capacity for 30 taxis, improve taxi waiting and pick-up/set-down facilities and make them freely accessible to all licensed taxi cabs;

Outline plan Transport Assessment (July 2008)

4.6.1 Taxis

The proposed Station Square will contain a rank for 28 taxis with a sheltered customer waiting facility in accordance with requirements originating from the SADF and transport workshops as detailed in Table 1.1. This includes 20 spaces for queuing taxis, 5 taxi 'pick-up' spaces and 3 taxi 'drop-off' spaces. This will enable 28 taxis to operate entirely within the Station Square, replacing both the existing rank on Station Road and the existing rank on the station forecourt. The existing public taxi rank on Station Road is, in practice, used only by CLTOA taxis as holding spaces to feed the station taxi rank. It will be partly removed by the highway authority in connection with permitted development on the Red House site and potentially removed entirely by improvements to Station Road for cyclists and buses in connection with the cb1 development (subject to planning and highways agreements). The taxi rank on the Station Square will continue to be subject to an agreement between the station operator and the CLTOA. The square will remain privately owned and managed and the station operator considers that the current type of agreement is beneficial to station operation. The City Council taxi licence officer and CLTOA have been consulted informally during the development of these proposals.

4.6.2 Disabled Parking

The proposed Station Square will provide 5 disabled parking spaces and 2 'drop-off' spaces for disabled passengers.

4.6.3 Private Vehicles

The proposed Station Square will also provide 16 spaces for the drop off of passengers by private vehicles. It is intended that the design and operation of this area will not encourage waiting for any longer than necessary to set down passengers.

Cambridge Local Plan (October 2018)

Policy 55: Responding to context

Development will be supported where it is demonstrated that it responds positively to its context and has drawn inspiration from the key characteristics of its surroundings to help create distinctive and high quality places. Development will:

a. identify and respond positively to existing features of natural, historic or local importance on and close to the proposed development site;
b. be well connected to, and integrated with, the immediate locality and wider city; and
c. use appropriate local characteristics to help inform the use, siting, **massing, scale, form,** materials and landscape design of new development.

Policy 56: Creating successful places

Development that is designed to be attractive, high quality, accessible, inclusive and safe will be supported. Proposals should:

a. provide a comprehensive design approach that achieves the **successful integration of buildings**, the routes and spaces between buildings, topography and landscape;
b. create streets that respond to their levels of use while not allowing vehicular traffic to dominate;
c. **create attractive and appropriately-scaled built frontages to positively enhance the townscape where development adjoins streets and/or public spaces**;
d. ensure that buildings are orientated to provide natural surveillance;
e. create active edges on to public space by locating appropriate uses, as well as entrances and windows of habitable rooms next to the street;
f. create clearly defined public and private amenity spaces that are designed to be inclusive, usable, safe and enjoyable;
g. be designed to remove the threat or perceived threat of crime and improve community safety;
h. use materials, finishes and street furniture suitable to the location and context;
i. **create and improve public realm**, open space and landscaped areas that respond to their context and development as a whole and are designed as an integral part of the scheme;
j. embed public art as an integral part of the proposals as identified through the Council's Public Art Supplementary Planning Document; and
k. ensure that proposals meet the principles of inclusive design, and in particular meet the needs of disabled people, the elderly and those with young children.

Policy 57: Designing new buildings

High quality new buildings will be supported where it can be demonstrated that they:

a. **have a positive impact on their setting in terms of location on the site, height, scale and form**, materials and detailing, ground floor activity, wider townscape and landscape impacts and available views;
b. are convenient, safe and accessible for all users;
c. are constructed in a sustainable manner and are easily adaptable;
d. successfully integrate functional needs such as refuse and recycling, bicycles and car parking;
e. design measures to reduce the environmental impact of the buildings, such as renewable energy systems and other rooftop plant and services, in an architecturally integrated way;
f. successfully integrate features such as meter boxes in an unobtrusive manner;
g. position building names and numbers clearly and ensure that secure letter boxes are conveniently located and accessible from the street; and
h. **include an appropriate scale of features and facilities to maintain and increase levels of biodiversity in the built environment.**

Policy 60: Tall buildings and the skyline in Cambridge

Any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form will be considered against the following criteria:

a. location, setting and context – applicants should demonstrate through visual assessment or appraisal with supporting accurate visual representations, how the proposals fit within the existing landscape and townscape;
b. impact on the historic environment – applicants should demonstrate and quantify the potential harm of proposals to the significance of heritage assets or other sensitive receptors (view of, backdrop and setting), assessed on a site-by-site basis but including impact on key landmarks and viewpoints, as well as from the main streets, bridges and open spaces in the city centre and from the main historic approaches, including road and river, to the historic core. Tall building proposals must ensure that the character or appearance of Cambridge, as a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints as set out in Appendix F;
c. scale, massing and architectural quality – applicants should demonstrate through the use of scaled drawings, sections, accurate visual representations and models how the proposals will deliver a **high quality addition to the Cambridge skyline and clearly demonstrate that there is no adverse impact**;
d. amenity and microclimate – applicants should demonstrate that there is **no adverse impact on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking or overshadowing, and that there is adequate sunlight and daylight within and around the proposals**; and
e. public realm – applicants should show how the space around tall buildings will be detailed, including **how a human scale is created at street level**.

Policy 61: Conservation and enhancement of Cambridge's historic environment

To ensure the conservation and enhancement of Cambridge's historic environment, proposals should:

a. preserve or enhance the significance of the heritage assets of the city, their setting and the wider townscape, including **views** into, within and **out of conservation areas**;
b. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the conservation area;
c. **be of an appropriate scale, form, height, massing, alignment and detailed design which will contribute to local distinctiveness, complement the built form and scale of heritage assets and respect the character, appearance and setting of the locality**;
d. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside assessment of the potential impact of the development on the heritage asset and its context; and
e. provide clear justification for any works that would lead to harm or substantial harm to a heritage asset yet be of substantial public benefit, through detailed analysis of the asset and the proposal.

Local Transport Plan (February 2020)

12. Cycling. Increasing the number of cycling trips through establishing safe and interconnected cycling links across region's cities, towns and settlements – be supported by Local Walking and Cycling Infrastructure Plans ensure that cycling walking infrastructure investment is based on evidence and prioritised for greatest impact.

- **Provide secure, conveniently located cycle parking that meets demand.**

National Planning Policy Framework (February 2019)

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as **meeting the needs of the present without compromising the ability of future generations to meet their own needs**.

104 (c). Planning policies should identify and **protect**, where there is robust evidence, **sites and routes which could be critical in developing infrastructure to widen transport choice** and realise opportunities for large scale development;

124. The creation of **high quality buildings** and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Local Transport Note 1/20 (July 2020)

11.3 Quantity of cycle Parking

11.3.4 **Spare capacity should always be provided to cater for growth and turnover.** The effect of new infrastructure should also be factored into any decisions about planned reserve capacity of cycle parking facilities.

Alignment of cycle tracks and ramps

10.8.21 … An absolute maximum of 8% [1 in 12.5] should be used for ramps.

Wheeling ramps

10.8.25 Wheeling ramps can be provided to enable cycles to be rolled up or down a flight of steps that interrupt a cycle route, such as [photograph of Cambridge Cyclepoint]. While they are better than simply requiring people to carry their cycle up and down stairs, they are not inclusive; they do not cater for non-standard cycles and are inaccessible to many people.

10.8.26 They will therefore only form part of an inclusive system if an alternative facility is provided which will cater for all users – see [photograph of travelator cycle lift at Utrecht Station, The Netherlands].

The Williams-Shapps Plan for Rail (May 2021)

14. … This will include identifying ways to improve accessibility, create new commercial space and **improve connections with walking, cycling** and other transport services …

23. … Each [Passenger Service Contract] will … **require the operator to support the integration objectives for bus travel and cycling set out in the government's recent bus and cycling strategies** [Gear Change: A bold vision for cycling and walking *and* Bus Back Better: National bus strategy for England].

40. … The government will invest substantial sums on **safe cycle routes to stations**, particularly in commuter towns such as Guildford and Harrogate, and **increase cycle storage at stations**, including at city-centre termini, where it is currently limited.

53. … This includes making it **easier to get to and from stations by walking, cycling** or other public transport …

Traffic signs manual chapter 6 (2019)

This guidance supersedes LTN2/95.

15.12 Proximity to priority junctions

15.12.3. The exact distance between a crossing and the junction will depend on the volume of turning vehicles and the pedestrian desire lines, but **there should be sufficient distance between the crossing and the priority marking for at least one waiting vehicle**. For signal-controlled crossings, it is important to make sure signal heads are aligned so that drivers cannot mistake a vehicular green signal on the signal-controlled crossing as a priority signal over traffic on the major road.

15.13 Approach to a roundabout

15.13.1. When crossings are needed on the approaches to a roundabout extra care is needed in the siting. There is no set minimum distance for a crossing from a roundabout but the considerations are similar to those in 15.12. The use of different types of crossing at the same site is not recommended as this could lead to confusion. **A Zebra crossing is preferred as it**

avoids any ambiguity as to priority that a signal-controlled crossing can create for the driver approaching or exiting the roundabout.

Figure 1: Height of B2 (left) relative to F2 (right) – both to the same scale. The edifice of B2, as seen from the corner of Devonshire Rd, is 6 metres higher than the edifice of F2.

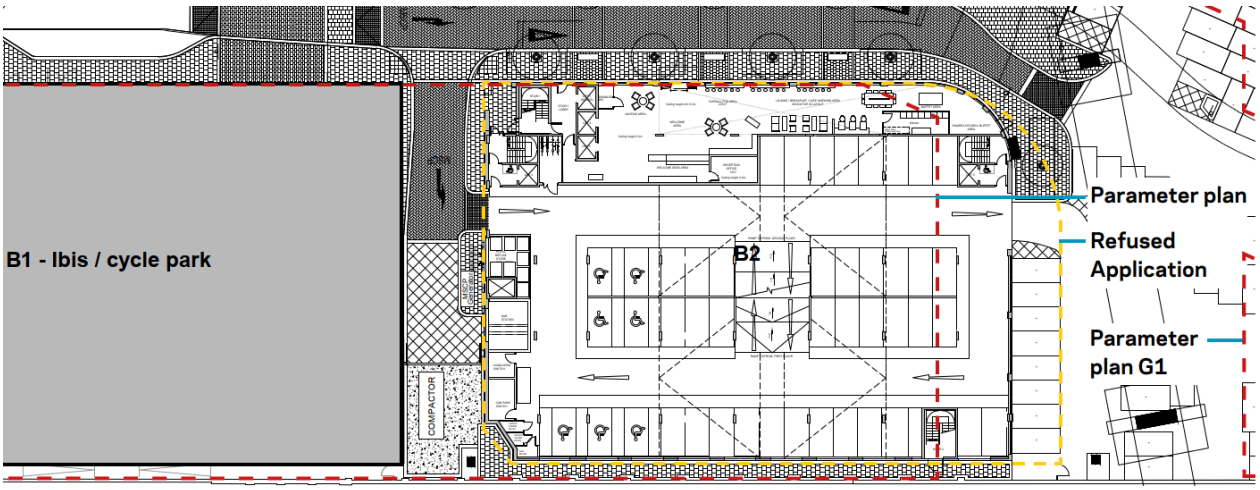

Figure 2: Current proposed footprint of B2 compared with outline plan (in red) and refused application (in yellow)

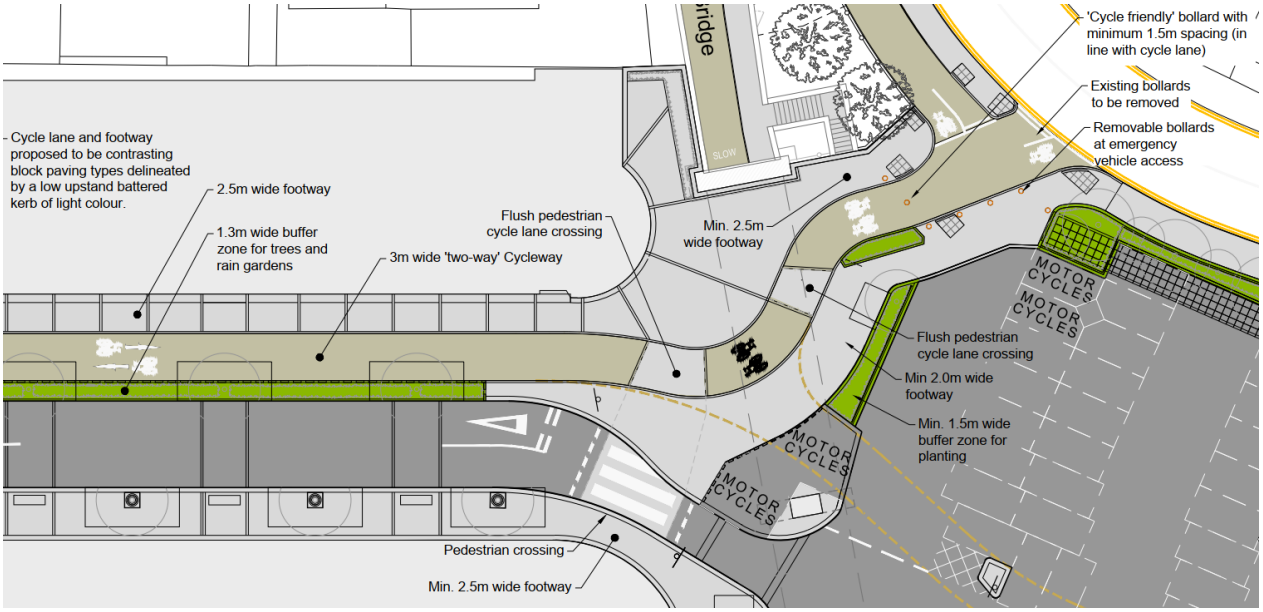

Figure 3: Proposed configuration of access from Devonshire Rd

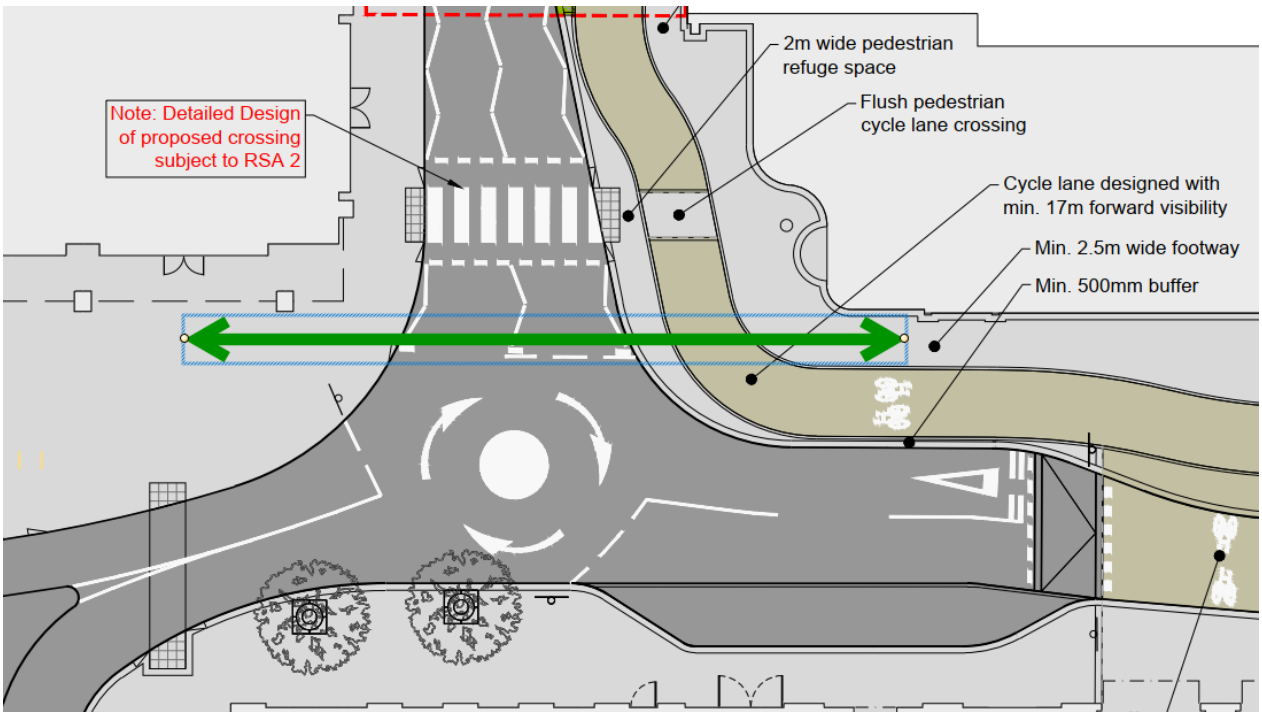

Figure 4: Proposed zebra crossing at east end of Great Northern Rd and pedestrian desire line (shown in green)

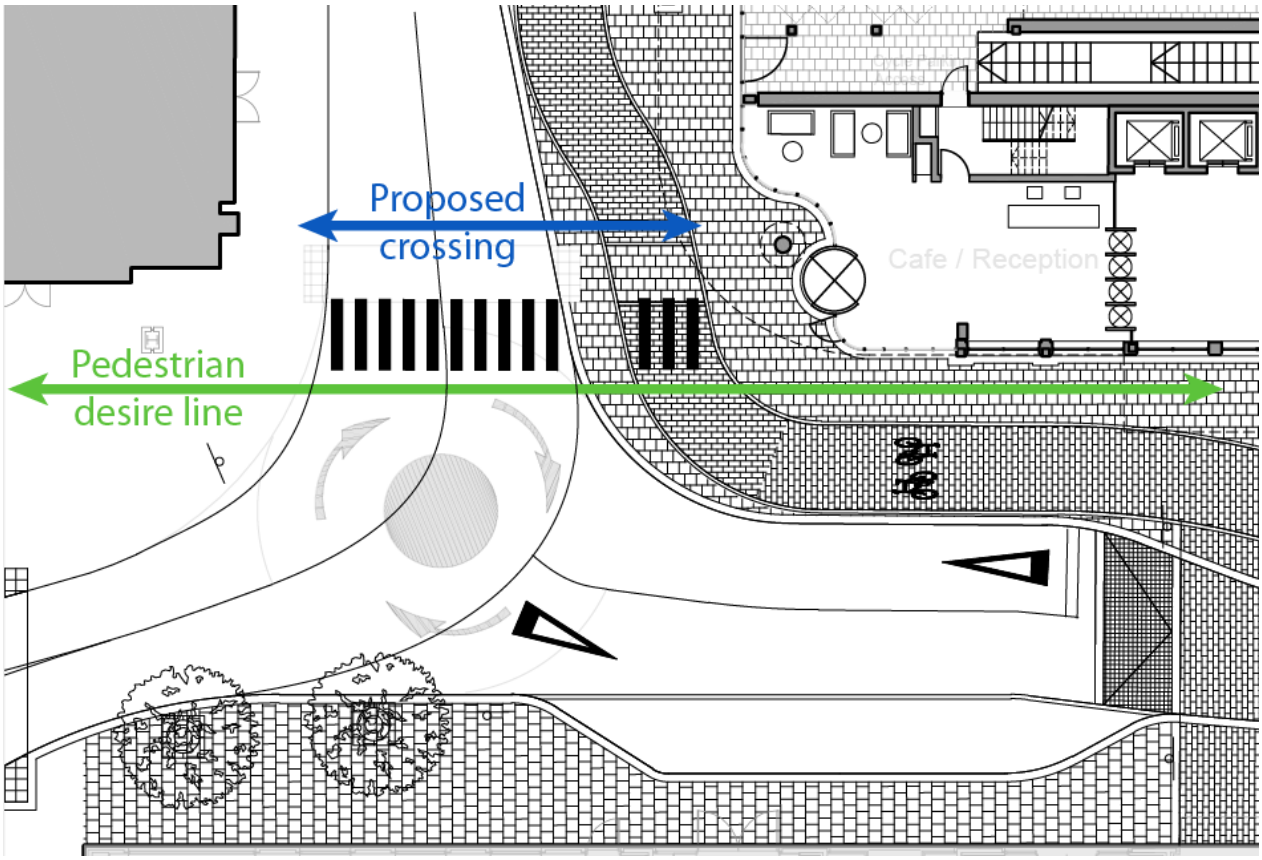

Figure 5: Suggested configuration of junction between Great Northern Rd and Northern Access Rd

Figure 6: Example of zebra crossing on bend in Station Rd, Romford (note that traffic speeds are likely to be higher than at the junction of Great Northern Rd)

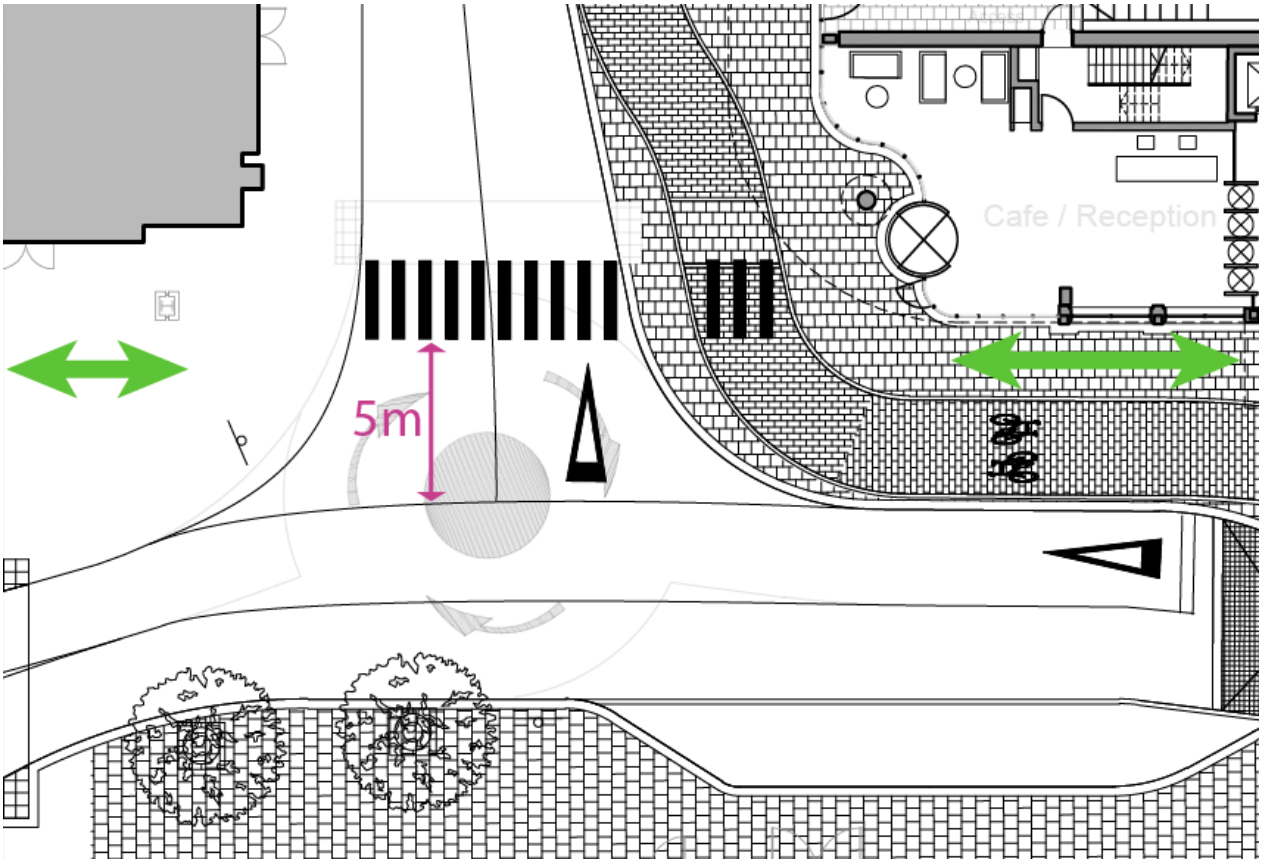

Figure 7: Alternative configuration for replacing the Great Northern Rd mini-roundabout and pedestrian crossing

Figure 8: Visibility of the pedestrian crossing is good for drivers leaving the pick-up/drop-off area

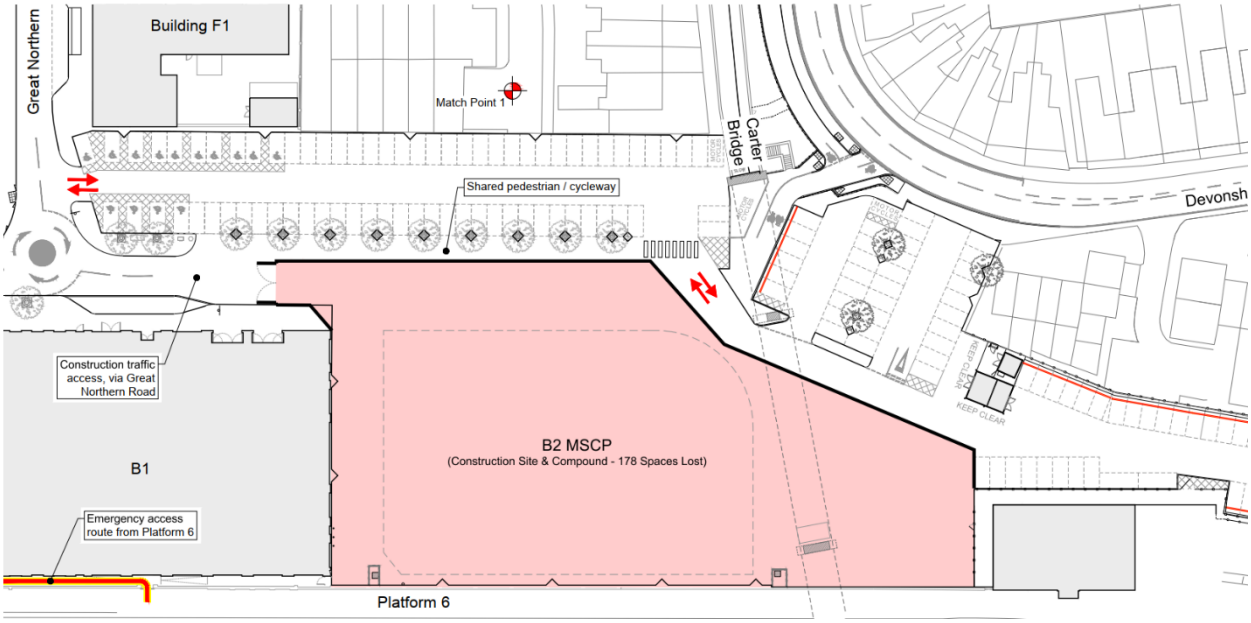

Figure 9: Access arrangements during construction of B2

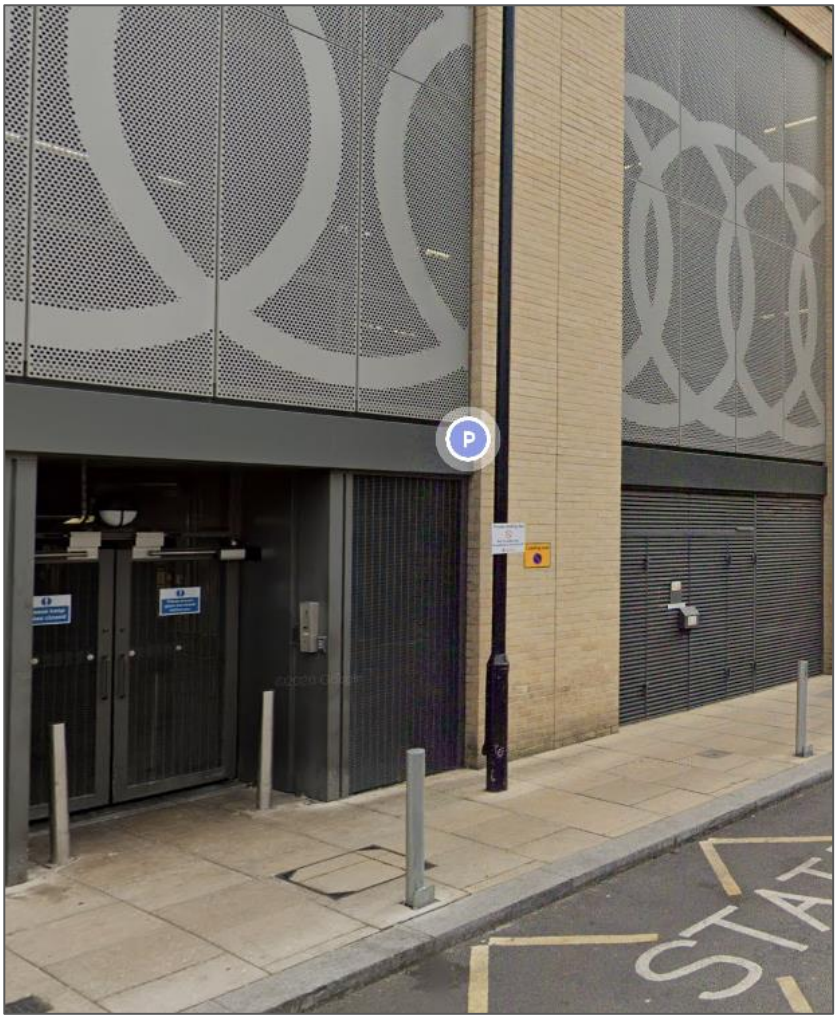

Figure 10: Constrained footway between the Ibis hotel and loading bay, partially obstructed by a lamppost

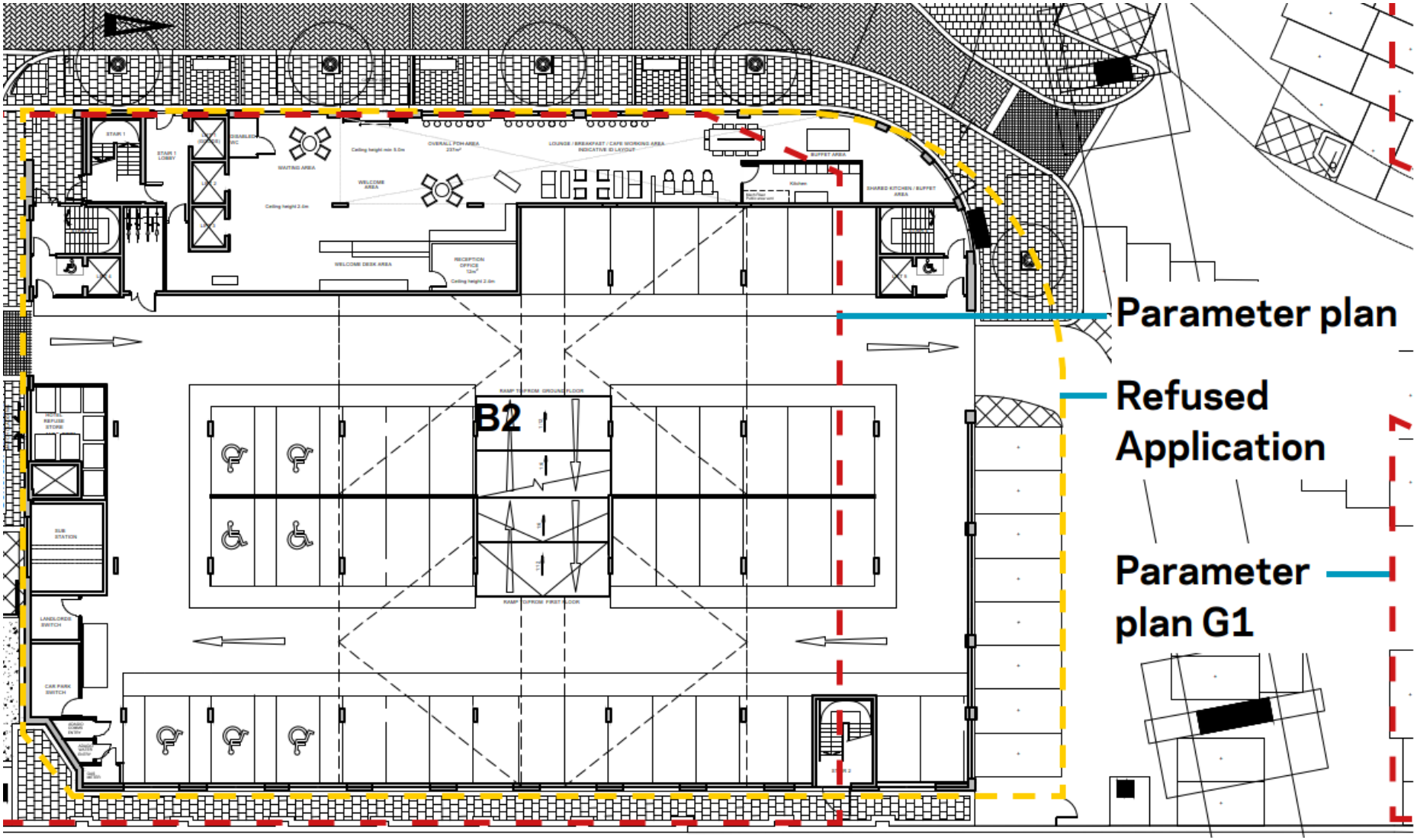

Figure 11: Footprint of block B2, which still extends 7m to the north of the consented outline plan