**PLANNING CONSULTATION RESPONSE**

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| **Responding Officer:** | **Adam Finch** |
| **Date:** | **26th July 2022** |
| **Planning Ref No:** | **22/02771/OUT** |
| **Our Ref No:** | **3352/22** |
| **Description of Development:** | **Land North Of Cambridge North Station, Milton Avenue, Cambridge** **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.** |

**Summary and Recommendations**

(Cambridge City Council Environmental Health)

In principle, Cambridge City Council Environmental Health do not object to this proposed development. The red line boundary is entirely within South Cambridgeshire. However, there are certain aspects of the development that may impact on Cambridge City residents and external amenity spaces therefore, if this application is approved, we recommend inclusion of planning conditions for the following:

* Construction Environmental Management Plan (CEMP) for the control of construction noise, vibration and dust,
* Artificial Lighting (specifically for the operational phase of the development),
* Provision of a scheme of mitigation measures proposed to offset the adverse air quality impacts forecast within the City boundary (including, but not limited to the proposals contained within Appendix 17.1 of the ES (‘Transport Assessment’ - Ref:05425 produced by PJA).

**Further / Detailed Commentary**

Thank you for consulting the Environmental Health Service at Cambridge City Council (CCC) on this application. The red line boundary of the development is located entirely within the district of South Cambridgeshire and therefore, the lead Environmental Health service for this project will be South Cambridgeshire District Council (SCDC). I am aware that they have already been consulted and will respond separately.

The primary issues that may be experienced within the administrative boundary of Cambridge City as a result of this development are as follows:

* Construction noise, vibration and dust,
* Artificial lighting (especially at the operational phase of the development) and
* Adverse air quality impacts following completion and full occupation of the development.

Further information on the issues listed above can be obtained from the relevant sections of the Greater Cambridge Sustainable Design and Construction SPD (January 2020) <https://www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd> and in particular section 3.6 – “Pollution” and Appendix 6 – “Requirements for Specific Lighting Schemes”.

Further, detailed commentary is provided below.

**Air Quality**

The proposed development is for a mixed use development including 425 residential dwellings, commercial buildings and a multi story car park which incorporates the existing Network Rail surface car park (428 car parking spaces) plus an additional 194 spaces with Network Rail car parking capped at 622 spaces. Car parking across the wider sites includes 417 commercial car parking spaces and 22 residential spaces with the residential element of the development being predominantly car free.

The development site is located within the South Cambridge District Council area close to the boundary with Cambridge City Council. In relation to air quality Cambridge City Council as a consultee has considered the application in the context of impact on local air quality within the city council boundary and in particular inside the Air Quality Management Area (AQMA). This impact is most likely to be in response to increased traffic movements.

The modelling detailed in ‘*Chapter 6 – Air Quality’* of the Environmental Statement confirms that pollutants remain below objective levels and air quality is not a constraint to development. Whilst we support this conclusion, policy is seeing a shift away from limit values towards exposure reduction and limiting impact of development.  A change in approach is key if Cambridgeshire is to sustain such extensive development and population increase whilst continuing to maintain and improve air quality across the region.

The modelling predicts that the operational phase of the development will have an adverse impact on air quality within the Cambridge City Council AQMA. This is contrary to Policy 36 of the Cambridge City Local Plan (2018). Therefore, mitigation is required.

*‘Appendix 17.1 – Transport Assessment’* (Ref:05425) produced by PJA and dated May 2022 confirms the provision of:

* 4 Car Clubs spaces (Section 4.4.5)
* Commitment to active electric vehicle charge points (EVCP’s) in all commercial and residential car parking spaces.

This is welcomed and considered acceptable mitigation to offset the potential impact inside the AQMA. **We would request that this is secured by condition.**

It is unclear from the application documents if these EVCP’s extend to the car parking associated with the operation of the Railway Station. We would encourage the applicant to consider installing active EVCP’s plus passive infrastructure to ensure the needs of future rail users is met as the demand for EVCP’s increases. It is far more cost effective for these installations to be carried out at point of build as opposed to retrofitting in the future.

**Construction Noise, Vibration and Dust**

Given the proximity of Cambridge City residents and external amenity spaces to the proposed development site, we consider that there will be a need for control, management and mitigation of construction noise, vibration and dust for the duration of the construction activities. For a large development such as this, we would usually recommend a condition requiring submission and approval of a detailed Construction Environmental Management Plan (CEMP) prior to the commencement of development.

Section 1 of the Environmental Statement confirms that a site wide CEMP will be submitted for approval prior to commencement of development and a draft template for the CEMP is provided in Appendix 4.2. This is welcomed. However, provision of a suitable and all-inclusive CEMP should be requested / required through a suitable pre-commencement condition.

**Operational Noise**

On review, it is unlikely that there will be any significant operational noise impacts within the Cambridge City boundary. It is anticipated that noise associated with any external mechanical plant will be adequately controlled at source in accordance with the standard requirements expected by our counterparts at South Cambridgeshire District Council Environmental Health. However, given the distances between potential sources and receptors within the city boundary, it is of low risk from our point of view.

It is also noted that the closest noise sensitive receptor locations within the city are separated from the development by the Guided Busway and no new roads / access routes are proposed near those receptor locations. As such, based on the information available, it is envisaged that noise from traffic around the completed development site will not be a significant concern for us.

**Artificial Lighting**

Chapter 13 and Appendix 13.2 of the Environmental Statement provide preliminary details for artificial lighting and provide an initial risk assessment. Given the proposed development on the western boundary of the site adjacent to existing receptor locations within the Cambridge City boundary, the impacts of artificial lighting may have an adverse impact at those locations, albeit possibly low risk when considering the separation distance. That said, it remains a valid concern that we require further detail and assessment on. Our own standard requirements in the city are as follows:

*“The applicant will need to establish the impact of proposed external artificial lighting on the surrounding environment. Details will need to be provided on the type, height and location of any external artificial lighting on the completed development and carry out an external artificial lighting impact assessment which will predict the resultant lighting levels at proposed and existing residential properties. External lighting levels must meet the Obtrusive Light Limitations for Exterior Lighting Installations (contained within the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light - GN01:2011, or as superseded) for light intrusion into windows (demonstrating vertical lux levels), luminaire Intensity and building luminance (if relevant).*

*The artificial lighting impact assessment will be required to establish lighting during pre- and post-curfew levels, in accordance with the ILP guidance notes and against an appropriately selected Environmental Zone (EZ).”*

These requirements are defined in the relevant section(s) of the Sustainable Design and Construction SPD. We recommend that an appropriate external lighting condition is attached to the planning consent if this application is granted approval.

Regards

Adam Finch

Senior Technical Officer

Environmental Quality and Growth

Environmental Health

Cambridge city Council