

10 March 2021

Report to: South Cambridgeshire District
Council Planning Committee

Lead Officer: Joint Director of Planning and Economic Development

20/04010/FUL– Land South West of Milton Park and Ride

Proposal: One and two storey building containing offices, custody suite and associated facilities, new access, internal access roads, hardstanding, car parking areas, landscaping, drainage attenuation features, lighting and means of enclosure.

Applicant: Cambridgeshire Constabulary

Key material considerations: Principle of development
Green Belt
Loss of agricultural Land
Landscape
Layout
Scale
Appearance
Biodiversity
Flood Risk and Drainage
Highway Safety, Management of Roads and Parking
Residential Amenity
Other matters

Date of Member site visit: None

Is it a Departure Application?: Yes (advertised as such)

Decision due by: -

Application brought to Committee because: The officer recommendation of approval conflicts with the recommendation of Milton Parish Council.

Officer Recommendation: Approval

Presenting officer: Lewis Tomlinson

Executive Summary

1. This application seeks approval of 5,131 sq m of floorspace in a part single and part two storey building to accommodate all the functions of a modern police service, including office, technical and support areas, welfare and custody rooms. The layout of the site includes the provision of access ways, parking, storage and circulation areas for vehicles, plant areas, landscaping, external lighting and surface water drainage areas.
2. The applicant is Cambridgeshire Constabulary. The proposed building would be the new Cambridgeshire Southern Police Station and all functions and services that are currently at Parkside will move to the proposed new police station. The current facilities at Parkside Police Station in Cambridge do not allow the Constabulary to fully respond to today's needs. There is limited room to meaningfully expand the existing station because it is in a built up area on a highly constrained site, there are too few cells, the location is subject to heavy traffic and the building doesn't meet modern standards.
3. The proposed site of the new police station is located outside of the development framework of Milton and therefore within open countryside. The site also falls within the Green Belt.
4. The proposed development is inappropriate development. Paragraph 143 of the National Planning Policy Framework (NPPF) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
5. Officers are satisfied that the applicant has demonstrated a case for very special circumstances and that the requirements of paragraph 144 of the NPPF are met and that harm to the Green Belt and all other harm arising from the proposal are outweighed by other considerations arising from the specific nature and requirements of the proposal to locate to this particular site and the wider public benefits arising. These benefits include the provision of a fit for purpose police station, appropriately located and fully equipped to serve an essential and strategic policing function for the surrounding communities of Cambridgeshire. Officers are therefore of the view that the proposal would accord with national and local policies in respect of Green Belt.
6. The design of the new building is responsive to the constraints of the site, with existing and enhanced landscaping incorporated to screen the development. The development incorporates enhancements to biodiversity and highway improvements for cyclists and pedestrians.
7. There are no technical objections to the proposed development from statutory consultees. Planning conditions are proposed to secure the precise details of matters including surface and foul water drainage, landscaping, biodiversity enhancements, highway improvements, contractor and construction arrangements and renewables.

8. The scheme has therefore been recommended for approval subject to planning conditions.
9. Under the Town and Country Planning (Consultation) (England) Direction 2009 there is a requirement for the application to be referred to the Secretary of State before any permission can be issued because of the size and location of the development in the Green Belt. The Secretary of State has the power to call-in the application for his own determination following any referral. The application will be required to be referred to the Secretary of State under this Direction if Members of the Planning Committee are minded to support the officer recommendation.
10. The recommendation is as follows:
 - a) Consultation with and confirmation from the Secretary of State that the application is not to be called in for his determination.

Relevant planning history

11. No relevant planning history

Planning policies

National Guidance

12. National Planning Policy Framework 2019
National Planning Practice Guidance 2018
National Design Guide 2019

South Cambridgeshire Local Plan 2018

13. S/1 – Vision
S/2 – Objectives of the Local Plan
S/3 – Presumption in Favour of Sustainable Development
S/4 – Cambridge Green Belt
S/5 – Provision of New Jobs and Homes
S/7 – Development Frameworks
CC/1 – Mitigation and Adaptation to Climate Change
CC/3 – Renewable and Low Carbon Energy in New Developments
CC/4 – Water Efficiency
CC/6 – Construction Methods
CC/7 – Water Quality
CC/8 – Sustainable Drainage Systems
CC/9 – Managing Flood Risk
HQ/1 – Design Principles
NH/2 – Protecting and Enhancing Landscape Character
NH/3 – Protecting Agricultural Land
NH/4 – Biodiversity

NH/8 – Mitigating the Impact of Development in and Adjoining the Green Belt
SC/2 – Health Impact Assessment
SC/9 – Lighting Proposals
SC/10 – Noise Pollution
SC/11 – Contaminated Land
SC/12 – Air Quality
TI/2 – Planning for Sustainable Travel
TI/3 – Parking Provision
TI/8 – Infrastructure and New Developments
TI/10 – Broadband

South Cambridgeshire Supplementary Planning Documents (SPD):

14. Sustainable Design and Construction SPD – Adopted January 2020
Cambridgeshire Flood and Water SPD – Adopted November 2016
Health Impact Assessment SPD – Adopted March 2011
District Design Guide SPD - Adopted March 2010
Landscape in New Developments SPD - Adopted March 2010
Biodiversity SPD - Adopted July 2009
Open Space in New Developments SPD - Adopted January 2009
Trees & Development Sites SPD - Adopted January 2009

Consultation

15. **Milton Parish Council** – Objection.

We object to development on Green Belt land which is facing threats from a number of proposed developments which are also in planning, in particular where the development would reduce the separation between surrounding communities. The proposed development adds to the isolation of some parts of the Green Belt thereby reducing its effectiveness and also increases the probability of further development proposals being made for the adjacent green Belt areas. Note that in December 2009 a planning inspector emphasised the importance of even small areas of Green Belt in protecting Milton from coalescence with Cambridge. We understand that the existing strong protections for the Green Belt will be reinforced under the new proposals announced by Robert Jenrick MP which should be taken into consideration.

Concerns on the A10 bridge.

The footbridge has low parapets and no lighting. The surrounding area is poorly lit. There is potential for increased anti-social behaviour including drug dealing in Butt Lane/Coulson Close area similar to that currently experienced in the Parkside area, which could discourage pedestrian and cycling activity. We would expect S106 funding to be available for CCTV on the A10 bridge which should be monitored 24*7 to evaluate any need for further enhancements, improved surveillance at the Park & Ride, and other items beneficial to Milton residents. We would urge attention to improve pedestrian and cycling access to

and from the proposed facility avoiding the need to pass through Milton and mitigate the risk of cyclists using the A10 for faster access to Cambridge.

Drainage

We remain very concerned about drainage particularly the impact on the 13th Public Drain not least because of storm water surges which are becoming more frequent and less predictable. It would be essential to ensure that the 13th Public drain be kept clear in both directions. We are also concerned to note that one of the consultants involved in the project has concluded in a report that infiltration SuDS are not appropriate for the development yet the proposal includes use of shallow SuDS similar to systems on the P&R site which have already resulted in some flooding to parts of Milton and the College of West Anglia. The proposed development proposal focusses on maintaining current run-off levels. We believe that the goals should be revised to take the opportunity not just to meet the status-quo but to improve the current situation to mitigate the flooding risk to the Milton area especially given the Met Office guidance that extreme weather incidents are likely to increase including significant increases in rainfall.

Future development

We are concerned that the plans allow for significant further development on the site which would result in further impact on drainage and traffic issues.

16. **Cllr Hazel Smith** (comments received prior to the submission of the new drainage strategy)

In the Drainage Strategy part 1 on page 44 the outfall from Network B of the drainage is to a 'watercourse'. On the ground this doesn't seem to be a watercourse at all. It is full of water and seems to be a swale. The police station development should be draining to the southern branch of the 13th Public Drain, i.e. to the south of the site. The field drains in those fields all drain in that direction and it is the lie of the land. When the A10 was built, or possibly when the P&R was put in, it looks as though the drain beside the road was put in to drain the water off the A10 road surface, and these drains seem to be designed to run north, even where they crossed the award drain (according to maps)! The drain beside the A10 does not connect to the 13th PD. This is a big mistake. I have spoken to Pat Matthews about this, and I hope the drainage strategy will include putting in a new ditch beside the A10 to drain from the traffic lights area to the 13th PD before it runs east under the A10.

17. **Cambridge Past Present and Future** - Objects

We ask that permission be refused on the following grounds:

1. It is inappropriate development in the green belt and the case for "exceptional circumstances" has not been adequately proven. It will result in harm to the green belt. It is therefore contrary to national and local planning policy.
2. There is no evidence in the application that there will be a gain in biodiversity, contrary to national and local policy.

3. The development is predicated on car travel, contrary to national and local transport planning.
4. The excessive car parking and the unsympathetic and unnecessary high security landscaping will cause harm to green belt and is therefore contrary to national and local planning policy.

18. **S106 Officer** – comments in relation to the A10 bridge CCTV

A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is -

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

My view is that test (a) necessary to make the development acceptable in planning terms is capable of being satisfied. In *R v Herefordshire Council* [2013] EWHC 3947 (Admin) Mr Justice Hickinbottom stated that the matter of necessity was not a “but for” test but rather “What is acceptable in planning terms is dependent upon a complex web of policies and other material considerations, and a series of planning judgments”. However, significant questions remain. There is no quantified evidence on the impact of the proposal, that this impact requires mitigation and how the infrastructure will mitigate the impact in a functional sense (i.e. who is responsible for the CCTV that has been requested).

My view is that test (b) is satisfied by virtue that the CCTV and/or surveillance would be installed within a short distance of the site on or adjacent public highway linking the site to the village and/or serving the park and ride site. To my mind this is plainly directly related to the development.

My view is that test (c) fairly and reasonably related in scale and kind to the development is capable of being satisfied. Given the scale of development and likely cost of the modest infrastructure, such a request has potential to be considered fair and reasonable. However, no capital costs have been submitted in relation to the request. There are often maintenance costs associated with the inspection of such infrastructure. Furthermore the 24/7 monitoring of additional CCTV cameras would introduce new costs for the operator meaning commuted sums would also likely be required. The absence of such information means that it would not be possible to calculate the expected level of contribution that would be required meaning that this test has not been satisfied.

19. **Contaminated Land Officer** – No objection subject to a condition regarding unexpected contamination.
20. **Ecology Officer** – No objection subject to conditions regarding Construction Ecological Management Plan and Landscape & Ecological Management Plan
21. **Environment Agency** – No objection.

22. **Environmental Health Officer** – No objection subject to conditions regarding CEMP, piling, dust, noise insulation, external lighting and plant noise
23. **Highways England** – No objection
24. **Historic Environment Team (Archaeology – Cambridgeshire County Council)** – No objection subject to a condition regarding a written scheme of investigation.

Our records indicate that this site lies in an area of archaeological potential. Previous archaeological investigations have been undertaken in connection with the landfill site to the south and west and the Park & Ride to the north. These investigations demonstrate that the site is located within a landscape which was intensively settled and farmed in the Roman period with evidence of Bronze Age and Iron Age date also apparent (Cambridgeshire Historic Environment Record references ECB1092, ECB1385, ECB1386, 11669, CB15701, ECB2453, ECB3123, MCB18209). Cropmarks recorded within the vicinity of the site indicate the layout of enclosures of probable Late Iron Age and/or Roman date (CHER ref 08320). It is thought likely that important archaeological remains could survive within the development area which would be destroyed or damaged by the proposed development.

25. **Landscape Officer** – No objection.

Recommend Woodland Management Plan 06 Rev C & Biodiversity Enhancement Strategy 05 D be included as approved documents.

Insufficient soft landscape details submitted on landscape masterplan; soft landscape to be conditioned.

Recommend details of boundary treatment, lighting and cycle storage areas be conditioned.

26. **Lead Local Flood Authority** – No objection.

The documents submitted demonstrate that surface water from the proposed development can be managed through the use of permeable paving, detention basins, bio-retention areas, a balancing pond and a below ground attenuation tank. This will restrict surface water to a rate of 3.5 l/s.

27. **Local Highways Authority Development Management Team** – No objection following the submission of the Stage 1 Road Safety Audit. Recommends conditions regarding traffic management plan, access construction, falls and levels, bound material, off-site improvement works.
28. **Local Highways Authority Transport Assessment Team** – No objection following the submission of the Transport Assessment Addendum dated January 2021. Recommends conditions regarding highway improvement works, signal timing review and a travel plan.

29. **Public Health England** – No comments to make.
30. **Sustainability Officer** – No objection subject to conditions regarding 10% carbon reduction from renewables, BREEAM design stage certificate and BREEAM post construction certificate.
31. **Sustainable Drainage Engineer** – No objection following the submission of additional information. Recommends a surface water drainage condition.
32. **Transport Assessment Team** – No objection.
33. **Trees Officer** – No objection.
34. **Urban Design Officer** – Support subject to conditions regarding materials.

Representations from members of the public

35. 3 representations have been received raising objections to the proposed development from the following addresses:
- 15 Latham Road, Cambridge
 - 21 Bowers Croft, Cambridge
 - 45 The Oaks, Milton
36. Full redacted versions of these comments can be found on the Council's website. In summary the following concerns have been raised:
- 30 cycle spaces are an under provision as Cambridgeshire Constabulary should be encouraging people to use sustainable transport
 - By limiting the amount of cycle spaces and having a large amount of car parking is sending the opposite message. The number of cycling spaces should be increased and the parking for staff should be reduced
 - People will be released from custody into the local area around Milton. There may be a fear of crime and safety due to this
 - People released from custody should be privately escorted to their home address and not use public modes of transport
 - The public facing offices should be in Cambridge city
 - Encroachment onto the Green Belt and lack of justification of why this site
 - An alternative non-Green Belt site should be selected
 - Questions over how the access arrangements will work when the park and ride is in use by parked cars
 - A single road leaves the potential for activists or terrorists to block the site
 - Communications strategy
 - The Police should set an example by being a gas free building

37. 2 representations have been received neither objecting to nor supporting the proposed development from the following addresses:

- 4 Bulteel Close, Milton
- 22 Primrose Lane, Impington

38. Full redacted versions of these comments can be found on the Council's website. In summary the following comments have been raised:

- Questions over the correct release protocol of being that have been detained
- Potential noise from sirens on police cars
- The site will generate traffic
- A10 will have traffic from Waterbeach New Town and North East Cambridge redevelopment
- Climate change crisis means the building should only be approved if it has state of the art energy efficient and renewable energy generation. Support will be given if its near carbon neutral

The site and its surroundings

39. The site is located outside of the development framework boundary of Milton in the open countryside on land within the Cambridge Green Belt. The area of the planning application is 3.44ha on what is currently arable farmland. The northern and eastern boundaries of the site are marked by a hedgerow and the western boundary is marked by a dry ditch. To the south and west are the remainder of a larger arable field. The site is broadly flat and has no public rights of way running through it. The site sits to the west of the village of Milton and is separated by the A10 trunk road. The site is north east of the City of Cambridge. To the west and northwest of the site, beyond the established tree and hedge line is Milton Landfill waste tip which extends to the west and south of the site beyond the field in which the proposed development is located. To the north is the Milton Park and Ride site. 400m to the south is the A14 and its interchange with the A10.

The proposal

40. This application seeks approval of 5,131 sq m of floorspace in a part single and part two storey building to accommodate all the functions of a modern police service, including office, technical and support areas, welfare and custody rooms. The layout of the site includes the provision of access ways, parking, storage and circulation areas for vehicles, plant areas, landscaping, external lighting and surface water drainage areas.

41. The proposed building would be for a new Cambridgeshire Southern Police Station. Key elements of the proposal include:

- Two storey office building with attached single storey custody facilities including the provision of 24 cells (4614m² gross internal area and 3083m² at ground floor)
- Detached property store (431sqm) and detached Scene of crime office (SOCO) store (111 sqm)
- 303 car parking spaces
- 30 cycle parking spaces
- New access from A10/Milton Park and Ride
- Pedestrian access into the Milton Park and Ride which will also act as emergency vehicular access

Planning Assessment

Principle of Development

42. The site is located outside of the development framework boundary of Milton and falls within the Cambridge Green Belt. The key issue when considering the principle of development is the application of Green Belt policy.

Green Belt

43. Chapter 13 of the NPPF focuses on protecting Green Belt land.
44. Paragraph 133 of the NPPF states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
45. Paragraph 134 of the NPPF states that Green Belt serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns;
 - e) and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
46. Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
47. Paragraph 144 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

48. Paragraph 145 of the NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt, subject to several exceptions, none of which apply to the proposal.
49. Paragraph 146 of the NPPF states that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds). None of the other forms of development set out in para. 146 apply to the proposal.
50. At a local level, policy S/4 of the Local Plan 2018 states that a Green Belt will be maintained around Cambridge that will define the extent of the urban area. New development in the Green Belt will only be approved in accordance with Green Belt policy in the NPPF. The supporting text to Policy S/4 details that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and a specific function of some Green Belts, such as the one around Cambridge, is to preserve the setting and special character of historic towns. Policy NH/8 of the Local Plan also seeks to protect the rural character and openness of the Green Belt with particular reference to the need for appropriate landscaping provisions to mitigate visual impact.
51. In terms of national and local planning policy, the proposal is inappropriate development in the Green Belt by definition. As per paragraph 143 of the NPPF, the applicant must demonstrate very special circumstances for the proposed development to be on this site.

Background

52. The applicant has submitted a Planning Statement, Green Belt Assessment, a Business Case and a Site Search document. These documents have been taken into consideration along with the other documents submitted with the application.
53. The Cambridgeshire Constabulary set out the following requirements for the proposal within the Full Business Case:
 1. Provide a Southern Cambridgeshire Police Hub, which is integral to the delivery of the Police Operational Model.
 2. Location of the Southern Hub needs to ensure that travel from point of detention to any custody facility is kept to a minimum.
 3. Any location of a new hub must align with the Police Operational Model so that policing within the whole county is efficient and sustainable.
 4. The occupation of the new Southern Hub will align with that already adopted at Thorpe Wood (Peterborough).
 5. There are some operational improvements identified at Thorpe Wood and these should be improved at any new facility.
 6. Other functions to be located within this new facility are:

- i. Neighbourhood Policing team
- ii. Scene of crime officers (SOCO)
- iii. Storage facility accessible to the public
- iv. Integrated Offender Management
- v. Public Protection
- vi. Abuse Investigation

7. The Custody facility needs to include:

- i. Minimum of 24 cells with the ability for future expansion, with a site size to achieve this.
- ii. All Custody MUST be on the ground floor in accordance with Home Office design guidance
- iii. Preferred radial design for custody, as this allows best view of site from the charge desk (rather than the racetrack design). This also allows space allocation for future expansion without major disruption to existing facilities or service delivery

8. Preferred model of office accommodation is 2 storey, 3 storeys would be acceptable if site size is limited

9. Car parking requirements

- i. Operations 68no. vehicles, including 10no. large spaces for vans
- ii. Staff required 242 no. spaces – to allow for staff shift patterns
- iii. Staff minimum nos. dependant on final location and what transportation links are available
- iv. Visitors, partners, site contractors 15-20 spaces

10. Ease of access to the site from the areas of high arrest as well as ease of access/egress for detainees; families; custody support services (i.e. Solicitors, Doctors) and police

11. Sensitivity to neighbours especially with regards to release of detainees

12. Transport links to enable detainee journey home

13. Economically viable

54. The applicants set out that work has been undertaken regarding the services and provisions that Parkside Police Station provides. The main options were:

- 1. Do Nothing
- 2. Refurbish/Remodel Parkside
- 3. Relocate Custody only, and retain other functions at Parkside
- 4. Relocate all functions from Parkside

55. Do nothing option: Major maintenance at Parkside would be required with no foreseen opportunities. To do nothing will not improve the current or future provision for policing in Cambridgeshire and would fail to meet the above objectives of Cambridgeshire Constabulary.

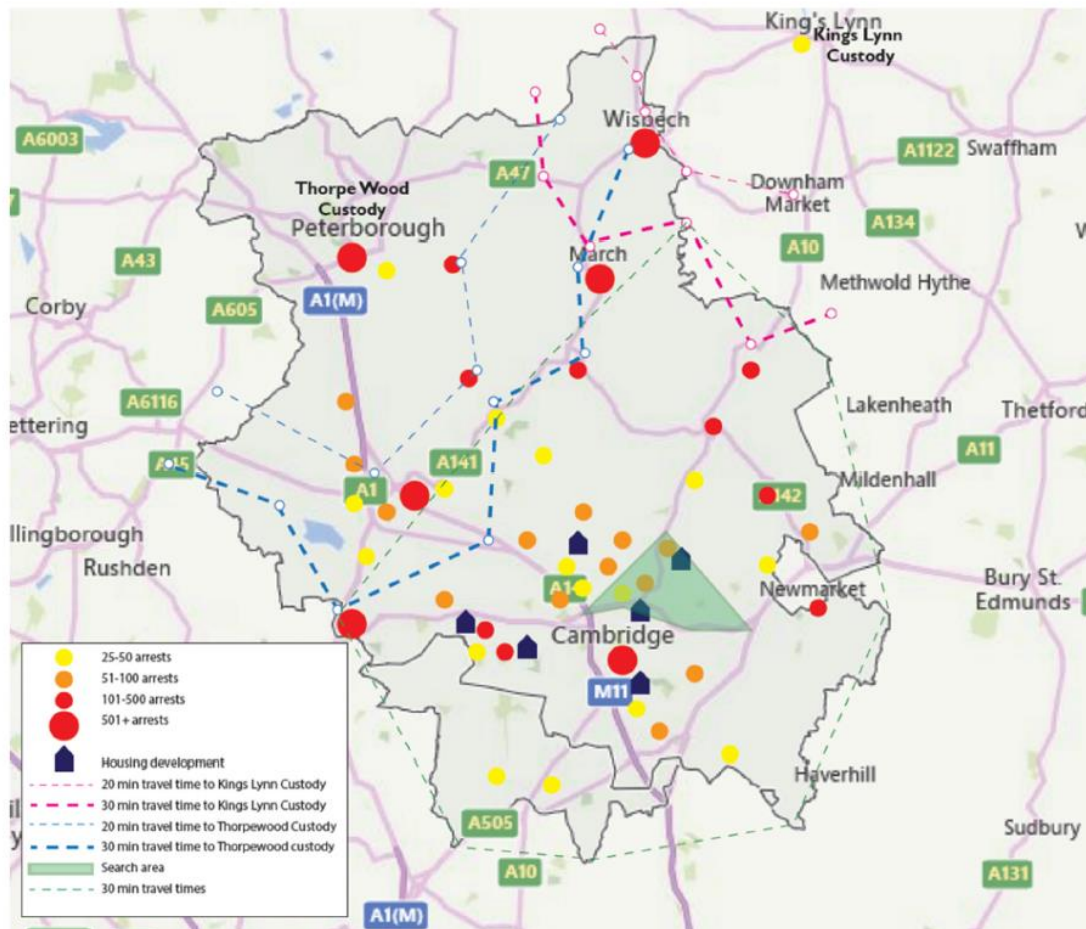
56. Refurbish/Remodel Parkside option: There is scope to complete a major refurbishment and remodelling works to Parkside including all the office accommodation and standalone CSI/Gymnasium block. However, the current site and building are limited in what could be achieved. The size of the custody facility will be limited and will still only provide 12 cells. Travel times from some areas within Cambridgeshire Police's southern operational area will be over 30mins as vehicles with detainees need to get to the congested centre of the city. There is also the fact that works would be very disruptive to the operation of the site and custody would need close while the works were carried out. Alternative custody provision and office space would be required. There are some improvements that could be gained from this option, but the extent of improvement of the facilities will be limited by the structure of the existing building and custody capacity could not be increased on the ground floor. This also fails to achieve many of the above objectives of Cambridgeshire Constabulary.
57. Relocate custody only option: While there are benefits of this option such as upgraded facilities, provision of cells and a longer life span, there are many downfalls to this option. Due to the location of Parkside being in the centre of Cambridge, a suitable site for custody would not be in close proximity to Parkside, land availability is limited, and land purchase costs would be high. Custody would therefore be located remotely from Parkside. Whilst custody provides a very specific function, it is not a standalone function. There is close liaison between the Child Abuse Safeguarding and Investigation Unit (CAISU) team, Neighbourhood team, response team and the investigation team. The remote distance between these functions if they were to stay at Parkside and a relocated custody facility, would entail additional travel for staff between Parkside and the new custody suite. This would increase operational costs as it is resource dependant. In addition, the time spent travelling between Parkside and the custody facility would impact on the limited detention time available to the police to carry out their investigations. This option requires a large capital investment whilst still retaining the costs associated with retaining Parkside. This is a major drawback of splitting the Custody from support functions – the potential efficiencies are lost and, in some cases, splitting the locations will give rise to new constraints. This option does not meet the aims and objectives of Cambridgeshire Constabulary.
58. Relocate all functions option: Similar to the custody relocation option, relocating all the current functions from Parkside to a new bespoke facility, would provide facilities with an expected lifespan of 50 years, with the assumption that due to the nature of the facility a full refurbishment may be required in 20 years. The facility would provide additional cells to the south of the county, which would be Home Office Design Guidance compliant, and would ensure that extended detainee travel times to another facility is not required. The office building would be designed to meet current and future Policing models, with open plan spaces to encourage collaborative working. This would both increase efficiencies and allow for flexibility to adapt to change. The flexibility provided by open plan office space more effectively future proofs the working environment as policing responds to changing crime, legislation, and processes. A town centre presence

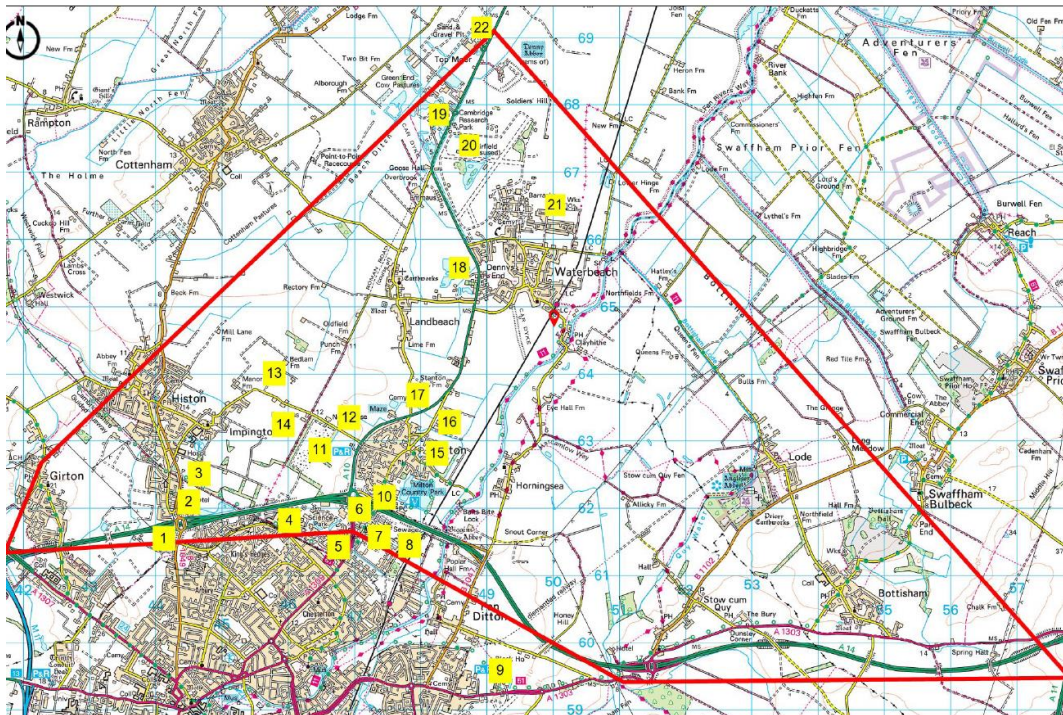
would need to be maintained so that policing is accessible and available at a local level. This would be a far smaller facility than Parkside and could be co-located with a partner authority. The future use of Parkside is still to be considered but would not be required as a location for police functions. This option would meet all the objectives of Cambridgeshire Constabulary and is set out in detail within the Full Business Case. A public enquiry desk and an overseas registration function will also be retained in the city centre station.

Site Search Criteria and Area

59. Based upon the preferred option of relocating all of Parkside functions, a site search was undertaken to find a site that would meet all the objectives. Cambridgeshire Police employed Process Evolution in 2017 to look at location options for a replacement Parkside and location of response officers. The report concludes that a two centre custody model with a north/south split is the best solution for custody within Cambridgeshire, this reinforces the Constabulary's adoption of the Policing Delivery Model which proposes a two centre approach for policing in Cambridgeshire. The other centre currently in operation is located on the outskirts of Peterborough at Thorpe Wood.
60. The Operational requirements of Cambridge Constabulary has informed the best geographical location for the new facility, such requirements include:
 - Travel time from point of arrest
 - Where arrests are happening
 - Ease of access to main road network
 - Parking availability for operational vehicles and staff
 - Transportation links for detainee on release and staff travel to/from work
61. Although response time is of high importance, it is less likely that officers will be responding from the custody facility. An officer will attend to a call whilst on patrol or from the location of a previous call.
62. A key aspect that highlights the importance of minimal travel times is the safety of officers and detainees whilst in transit. Extended travel time and distance increases risk of potential harm during transfer from point of arrest to point of detention. Guidance dictates that an intoxicated detainee needs to be roused and spoken to at least every 30 minutes to check on their condition. This can be difficult during van transfers to custody. This risk needs to be kept to a minimum and a 30-minute maximum travel time can therefore be justified. Therefore, travel time in this situation is from the place of arrest to custody, rather than response time from custody.
63. The designated search area for the new site ensured that travel time from point of arrest to custody would be within the 30 minutes transfer time. Thorpe Wood Peterborough and Kings Lynn had their travel times mapped to display the area within a 30 minute travel zone. The area of site search was further mapped by identifying the locations of the County not within the Thorpe Wood/Kings Lynn 30 minute zone. This resulted in the triangular zone of search, which would

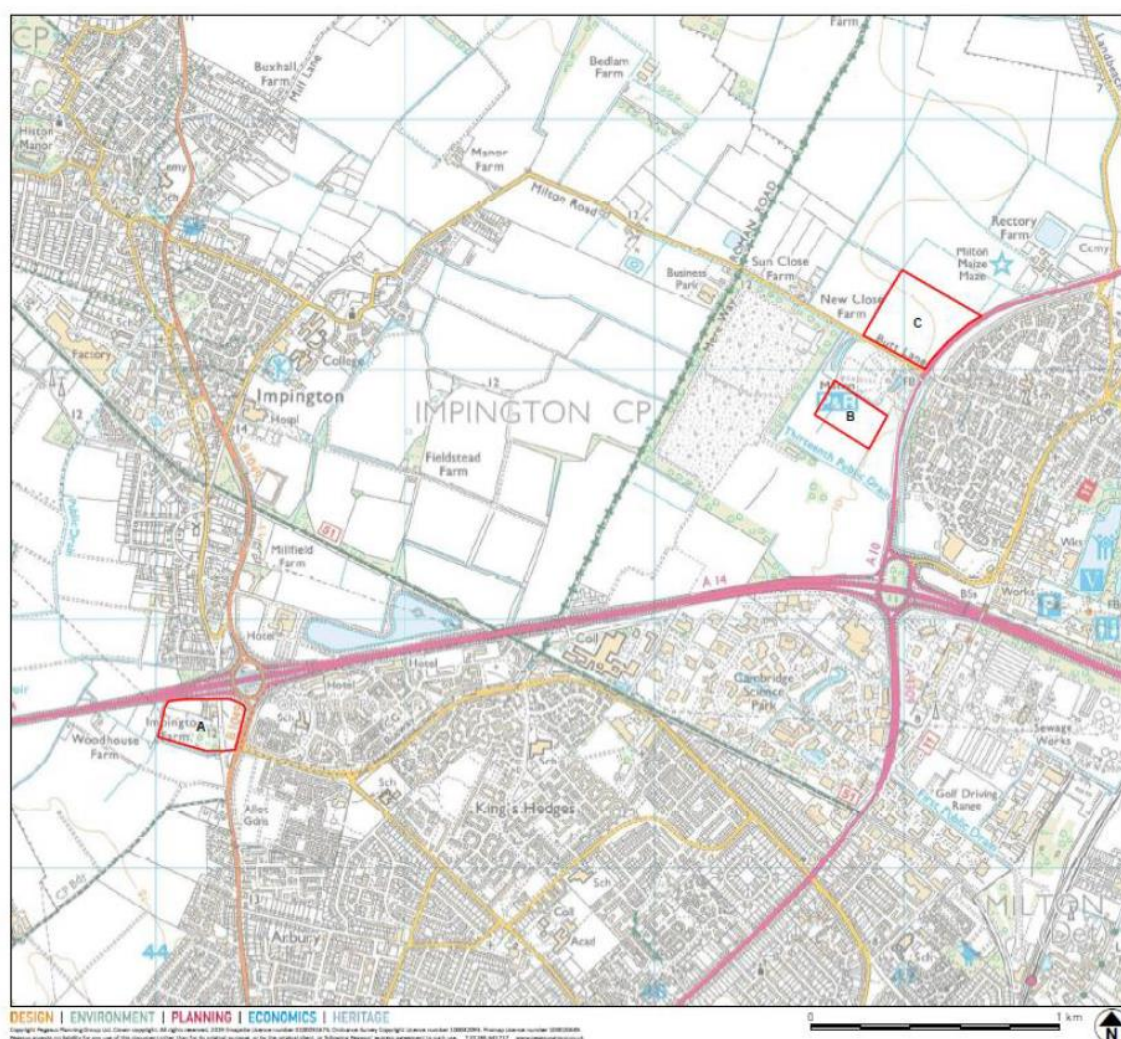
provide a location for any new custody facility, that would provide optimal coverage.





65. One of the key objectives is to minimise the detainee travel time and as such the search area was narrowed down to north/northwest of Cambridge City. A sequential, sieving approach was adopted to reduce the list of initially identified sites to ensure that only those that could deliver the objectives were carried forward. 22 sites in total were considered as shown above. Sites were ruled out on functional grounds and those remaining were tested for availability.
66. Cambridge Past Present and Future commented on the lack of information about why 6 sites were ruled out. The applicant has provided additional information regarding these sites:
- EMG, 379-381 Milton Road, Cambridge - This site was not previously identified as a possible site, however, on review the site is not of sufficient size and configuration to accommodate the operational requirements for the new station.
 - Cambridge North East, Cowley Road, Cambridge – An approach to secure a suitable site was rejected.
 - Cambridge North, Cowley Road, Cambridge – An approach to secure a suitable site was rejected.
 - Wing Development, Newmarket Road, Cambridge – An approach to secure a suitable site was rejected.
 - Evolution Business Park, Milton Road, Impington, CB24 9NG - The surplus land on the site is insufficient for the proposed scheme and remaining land is subject to current tenancies making acquisitions unaffordable and beyond reasonable timelines.
 - Cambridge Research Park, Waterbeach - There is land availability, but this is earmarked for high value commercial development and approaches to Royal London have been rejected in the past.

67. Following the sieving process, this reduced the number of possibilities to just three sites, all of which stand in the Cambridge Green Belt (see map below).
68. Site A (Land west of Histon Road and south of the A14) - within the Inner Green Belt area, contributes to prevention of sprawl and a limited contribution to the character and setting of the City
69. Site B (the site proposed)– recognised as being of relatively low value in green belt terms because of the impact of adjoining uses, notably the raised area of landfill and its associated tree belt, the waste recycling facility and park and ride site.
70. Site C (land north of Butt Lane) - has a strong affinity with the flat and open agricultural character of the green belt to the north of Cambridge



Green Belt value of the site

71. The applicant has submitted the following document: *Cambridge Green Belt Assessment, Three sites North of Cambridge by Pegasus Group dated September 2020*. This document was undertaken to identify the relative

contribution to Green Belt purposes made by each of the above 3 sites to identify which would be the least harmful in Green Belt terms.

72. The submitted Green Belt Assessment concludes that the proposed site 'is the least sensitive due to its location next to the landfill site and context provided by the Milton Park & Ride. It's landscape and visual characteristic, and context also play a significant role in lowering the sense of openness one would associate with the open countryside around Cambridge'. Officers agreed with this assessment.

Conclusion

73. Both Milton Parish Council and Cambridge Past, Present and Future have raised concerns that the approval of this application could set a precedent for future development within the Green Belt on adjacent sites. Officers do not consider this to be the case. This proposal is assessed on its own merits and the very special circumstances that have been put forward by the applicant. A precedent would not be set.
74. The development proposal is inappropriate development in the Green Belt and outside the Development Framework boundary. The key consideration for members is whether very special circumstances which justify planning permission being granted have been put forward. In doing so, Paragraph 144 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
75. The applicant has put forward in the Planning Statement that very special circumstances have been demonstrated through a clear explanation of the Cambridgeshire Constabulary aims and objectives in the provision of a Cambridgeshire South Police Station. This has resulted in the identification for a site outside of the urban area of Cambridge. Officers consider the applicant has undertaken a robust assessment of the police force's operational needs which has led them to conduct an acceptable site search. It is considered that the site, south of the Milton Park and Ride, would result in the least harm upon the Green Belt and that the needs for this site are unique to the police force. Officers are therefore satisfied that the applicant has demonstrated a case for very special circumstances and that the requirements of paragraph 144 of the NPPF are met and that harm to the Green Belt and all other harm arising from the proposal (as set out and justified in the following paragraphs including the loss of agricultural land) are outweighed by other considerations arising from the specific nature and requirements of the proposal to locate to this particular site and the wider public benefits arising. These benefits include the provision of a fit for purpose police station, appropriately located and fully equipped to serve an essential and strategic policing function for the surrounding communities of Cambridgeshire. This is a significant public benefit arising from the proposal.

76. Officers consider that the application has demonstrated very special circumstances in accordance with paragraph 144 of the NPPF and policies S/4 and NH/8 of the Local Plan.
77. Planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (section 70(2) of the Town and Country Planning Act 1990 and section 38[6] of the Planning and Compulsory Purchase Act 2004). Whilst contrary to policy S/7 (there is no express policy supporting this type of development outside the framework boundary), material considerations including the operational need and advantages of this particular site, its landscape characteristics and value, immediate land use context and the public benefits that would arise, suggest that there are material considerations which weigh in favour of departing from the provisions of policy S/7 in supporting the proposal.

Loss of Agricultural Land

78. The applicant has submitted an Agricultural Land Classification document which contains the findings of an agricultural land classification survey for the site. The survey concludes that the agricultural land within the site is Grade 2 (2.9ha 85%) and subgrade 3a (0.4ha, 12%) quality.
79. Policy NH/3 (Protecting Agricultural Land) states that planning permission will not be granted for development which would lead to the irreversible loss of Grades 1,2 and 3a agricultural land unless:
- a. Land is allocated for development in the Local Plan;
 - b. Sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land.
80. Given the justification for the proposal that has been put forward by the applicant, officers consider the need for the development in this location and the public benefits arising are sufficient to override the need to protect the agricultural land which would be permanently lost as a result of the proposal. The proposed development is contrary to policy NH/3 but material considerations indicate that there is planning justification to support the loss.

Landscape Impact

81. As the site is located within the countryside and the Green Belt, the visual impact of the proposal on the surrounding landscape is a key material consideration. A Landscape and Visual Impact Assessment (LVIA) has been undertaken and submitted with the application. This has been assessed by the Landscape Officer. The site is located directly to the south of the Park and Ride, with the proposed building being sited close to the boundary. The building would be seen in the context of the landfill and the Park and Ride when viewed from the A10.
82. The Landscape Officer agrees with the applicant that following appropriate landscape mitigation works the site is capable of accommodating a

development without resulting in material harm to the surrounding countryside's landscape character and views from the wider and local area. The scheme proposes to retain the majority of the boundary vegetation, other than access requirements and also seeks to provide new boundary tree and hedge planting to integrate the development into the landscape. This additional planting will help ensure that views would be controlled and screened, and to help further reduce limited landscape character and visual effects particularly from the A10.

83. Undertaking the outlined landscape mitigation measures would then comply with policies HQ/1 and NH/2 to preserve or enhance the character of the local rural area and respond to its context in the wider landscape. The Landscaping would mitigate the appearance of the security fencing as the highest portions of fencing would be located close to the main massing of the building away from the edges of the site.
84. The Landscape officer confirms that if the landscape principles outlined in sections 7 & 8 of LVIA are secured, then the development would have a limited effect upon the rural character and openness of the Green Belt in compliance with policy NH/8. Conditions regarding further landscape detail and management are recommended in line with the Landscape Officer's request.

Layout, Scale and Appearance

Layout

85. The development site is relatively level, sloping gently down from the northern corner towards the south west corner. The building has been positioned centrally to the front of the site to allow visitor parking areas to be located towards the front of the building and close to the public entrances. The orientation of the building results in the main elevation facing north east so it is clear where the public entrance to the building is when entering the site from the north east. Staff and operational parking are wrapped around the rear and sides of the building to the south east and west of the building respectively. Staff and operational parking are located behind a secure fence line providing security control of these areas. A café terrace area is located to the south west of the building which would be a semi-enclosed space for staff.
86. A property store is located at the north west part of the site within the public realm of the site. The custody suite is located to the rear of the building to allow for maximum security and also privacy for those in custody. The arrival of detainees to the custody suite would be visible from the public domain at the front of the building due to this layout.
87. There are a number of strict functional considerations that have had to be taken into account when designing the scheme. The proposed layout of the custody suite must strictly follow the Home Office design guidance which states that all custody suites must be on the ground floor. This has resulted in the radial layout of the custody suite allowing maximum visibility of the cell corridors from the charge desk and allows for possible expansion in the future if required.

88. Due to the proposed use of this building and its location, to ensure the safety of staff and visitors, there needs to be a security strategy in place which involves securing the inner and outer perimeters of the site. There is a requirement for different levels of security fencing dependant on the risk to the building, people and property. The 3 types of fencing required for this site are set out within the Design and Access Statement and indicated on the site plan. To need for and height of the fencing types are set out below:
1. Custody area (High security) – to ensure a safe and secure area for the transfer of detained persons being transported to or from the custody block and reducing the opportunity of escape. Proposed fencing - Weldmesh security fencing (black) 4m in height with electronic, access controlled sliding gate, with fob access for staff and audio/visual call button controlled within the custody block.
 2. Police vehicle car park (Medium security) – To reduce the incidents of damage or sabotage to police vehicles, reduce the opportunity of theft of the vehicles or police property from them. Proposed fencing - Weldmesh security fencing (black) 2m in height, access controlled sliding gate, with fob access for staff.
 3. Staff vehicle car park (Low to medium security) – To reduce the incidents of damage to police staff personal vehicles and ensure the safety of personnel when leaving the station at all times of the day and night. Proposed fencing - Jacksons Barbican Vertical Bar security fencing (black) 1.8m in height, access controlled sliding gate with fob access for staff.
89. In addition to the security fencing, the scheme also includes external lighting and strategically placed CCTV cameras to ensure the site is covered. Further protection would be provided to the building by installing bollards in the public area outside the building that would maintain physical security against motor vehicles but will still allow greater visual permeability around the building.
90. The proposed building and its associated property/SOCO stores would only cover circa 11% of the site. The proposal has aimed to create the most functional layout for the site while maintaining necessary security, operational needs and privacy. The Urban Design Officer and Landscape Officer both support the proposed layout. For these reasons it is considered the proposed layout of the site is acceptable and legible.

Scale

91. Following pre-app advice from officers, the scheme submitted has been reduced down in bulk and size and represents the minimum possible development to meet the operational requirements of the police force. The proposed building would be of a two storey scale with an attached single storey custody suite. When viewed from across the approach road and from the A10, the building would maintain a low and articulated profile. The visual impact would be lessened when viewed from the North and East because of the

elevated landfill site adjacent. The scale of the building would be further mitigated by existing and proposed planting which would soften and limit views.

92. The applicant has designed the building so the required plant on the roof is hidden behind the proposed parapet. Where air handling units are likely to exceed the parapet level, louvered screens are set back from the roof edge to act as discreet screens.
93. The proposed scale of the building has been reduced down to its core needs. Both Landscape and Urban Design Officers are satisfied with the proposed scale of the building. The scale of the building is acceptable.

Appearance

94. The building would be constructed mostly of 'Cambridge Cream' brickwork to help reflect existing building finishes in the surrounding area and the wider Cambridge area. This type of brickwork would also help ensure the building appear lighter in its surroundings. In order to provide some articulation to the elevations, a blue brick plinth feature at ground level to emphasise the ground floor of the projecting entrance area is proposed. The entrance area, which projects from the front elevation of the building, would have gold coloured cladding panels introduced at first floor level, surrounding full-height glazing, to provide a clear contrast to the brickwork to signify that it is the public entrance for people attending the site.
95. The building would also consist of significant areas of glazing which would further lighten the mass of the building. Generally the glazing is contained in frames which span across the intermediate floor zones and where appropriate extends to the ground to allow the inclusion of door openings for fire escapes and access to external areas. Vertical glazing panels are also proposed which help shape the building. The appearance of the building is supported by the relevant consultees and the planning officer.

Overall

96. The layout, scale and appearance of the building are all appropriate and of high quality. The proposal is in accordance with policy HQ/1 of the Local Plan.

Biodiversity

97. The site consists of an arable field, with a linear row of trees to the centre of the site, and large wooded buffer planting to the west and south. There are no non-statutory protected sites in the vicinity that are likely to be impacted by this application. Species records show amphibians, barn owls and other breeding birds, flowering plants, reptiles, bats, brown hare, badger, and hedgehog have been recorded locally.
98. The application is supported by an Ecological Impact Assessment (The Landscape Partnership, July 2020). The report has found minimal ecological constraints on site, as the site is predominantly arable habitat. There are some

recommendations for avoidance and mitigation strategies which are considered to be acceptable following consultation with the Council's Ecology Officer who is in general agreement and support of the ecological details submitted. Conditions regarding a Construction Ecological Management Plan (CEcMP) and a Landscape and Ecological Management Plan (LEMP) are recommended. The proposal is therefore in accordance with policy NH/4 of the Local Plan.

Flood Risk and Drainage

99. The application site is in Flood Zone 1 and is therefore considered as having a low probability of flooding and suitable for development in terms of flood risk. The application is supported by a Drainage Strategy Report and plan outlining the proposed offsite ditch. Following comments received from the Parish Council and Cllr Hazel Smith, the applicant has sought to address this through the inclusion of a new ditch that would run parallel to the A10.
100. The Lead Local Flood Authority (LLFA) and the council's Drainage Officer have been consulted as part of the application and following the submission of additional information, both the Lead Local Flood Authority and Drainage Officer support the proposal in terms of flood risk and drainage.
101. The submitted documents demonstrate that surface water from the proposed development can be managed through the use of permeable asphalt across parking areas. A swale network is proposed along the southwest and eastern boundary of the site, with an attenuation basin on the north-west boundary to receive flows from the parking areas. Runoff from the impermeable highway areas is proposed to drain into this swale network through a dropped kerb arrangement. The site is split into two outfalls, one to the east at a rate of 3.1 l/s and one to the north-west at 6.1 l/s, both through Hydrobrake flow controls. A new ditch is proposed from the eastern outfall to convey water suitably to the 13th Public Drain. The surface water drainage network for the development will be maintained by a private management company.
102. The Parish Council has raised an objection on flood risk and drainage grounds:

'We remain very concerned about drainage particularly the impact on the 13th Public Drain not least because of storm water surges which are becoming more frequent and less predictable. It would be essential to ensure that the 13th Public drain be kept clear in both directions.'

We are also concerned to note that one of the consultants involved in the project has concluded in a report that infiltration SuDS are not appropriate for the development yet the proposal includes use of shallow SuDS similar to systems on the P&R site which have already resulted in some flooding to parts of Milton and the College of West Anglia.'

The proposed development proposal focusses on maintaining current run-off levels. We believe that the goals should be revised to take the opportunity not just to meet the status-quo but to improve the current situation to mitigate the flooding risk to the Milton area especially given the Met Office guidance that

extreme weather incidents are likely to increase including significant increases in rainfall.'

103. Neither the LLFA nor the Drainage Officer have raises concerns about the impact of the development on the 13th Public Drain. The maintenance of the 13th public drain, which is an awarded watercourse, is the responsibility of the Council.
104. The development is not relying on infiltration for disposing of surface water as groundwater levels are too high. The Drainage Officer has confirmed that non-infiltrating SuDs features can almost be identical to those used for infiltration. This is because these provide best practice designs but they can be utilised in different ways. In this particular case, they are not for infiltration but attenuation and conveyance.
105. The LLFA have not raised betterment as factor and they are the body that oversee this type of flood risk in the strategic sense. It is to be noted that the Drainage Officer has also not requested betterment and has accepted that the development will be maintaining the status quo.
106. Officers accept the advice of the LLFA and the Drainage Officer. For these reasons, it is considered that the proposal complies with policies CC/7, CC/8 and CC/9 of the Local Plan. The development would not lead to an increased risk of flooding, would protect water quality and be subject to an appropriate means of SuDS drainage given the site characteristics. Subject to appropriate conditions regarding a detailed surface water drainage scheme and a long-term maintenance arrangement, the scheme is acceptable.

Sustainability

107. The applicant has submitted a Sustainability and Energy Statement, BREEAM pre-assessment and BRUKL output document which has been assessed by the Sustainability Officer. This estimated carbon data demonstrates that the measures included in the report could see the new building achieve a carbon saving in excess of 20% from the inclusion of renewables and low/zero carbon technologies. This would make the development compliant with the requirements of Local Plan Policy CC/3. The applicant has provided a full BREEAM pre-assessment report which suggests that measures will be included in the new building to achieve a score of 55.90%, achieving a 'Very Good' rating. This report also gives details of how the building will achieve 2 credits from WAT01, for water conservation, making the proposed building compliant with Local Plan Policy CC/4.
108. The Sustainability Officer supports the application. Conditions regarding 10% carbon reduction from renewables, BREEAM design stage and post construction stage certificates are recommended in order to ensure compliance with the submitted information and local plan polices.

Highway Safety, Traffic and Parking

Car Parking

109. Policy TI/3 of the Local Plan does not provide specific parking standards for this type of proposed development. While no specific standards are identified, the policy makes clear that the applicant must provide clear justification for the level and type of parking proposed in the Design and Access Statement and/or Travel Plan, and will need to demonstrate they have addressed highway safety issues.
110. The applicant has submitted a Transport Assessment which outlines the operational needs of the police and uses a first principles approach to calculate expected car parking demand. The new police station will employ 388 existing staff who are currently employed at existing stations. The number of staff could increase by 122 officers through recruitment prior to the opening of the building. Police shift patterns have informed the parking requirements. A 10% reduction factor has been applied to account for sickness/leave/training. An 80% factor has been applied based on anticipated staff modal split as suggested by the results of a travel survey completed by existing staff.
111. Therefore, the minimum number of staff employed on site could be 388 plus any growth that has happened prior to opening, increasing to a maximum of 510 after growth has been completed. The number of staff expected to be on site at any one time is 183 prior to growth, and 246 after growth. The maximum parking demand is expected to be 146 prior to growth, and 196 after growth.
112. The proposal would provide 303 car parking spaces in total. In addition to staff parking for the site, car parking spaces must also be provided for operational police vehicles, Scenes of Crime Officers (SOCO) and visitors. Please see the below table for the break down.

Parking:	
Operations:	68
SOCO spaces	8
General visitor spaces:	10
Custody visitor spaces:	10
Staff:	153
Overflow parking:	54
Total parking:	303

113. The 153 staff parking spaces exceeds the initial anticipated parking demand of 146 spaces. Following anticipated growth in officer numbers the staff parking demand is anticipated to grow from 146 spaces at opening to a maximum of 191 spaces in future. The overspill parking area ensures that this demand can be accommodated on site as it increases the maximum staff parking provision from 153 spaces to 207 spaces, 16 more than demand. The Transport Assessment states that the growth in parking demand represents a worst case scenario with the exact future parking demand depending on the actual growth in officer numbers at the new site, and the accuracy of assumptions regarding

staff sickness/ leave/ training and modal split. The overspill parking area therefore provides flexibility in responding to future parking demand and ensuring that future capacity requirements are captured in the submitted design of the site.

114. Third party representations have questioned why the Police Station couldn't rely on the Park and Ride to accommodate the parking requirements. The Park and Ride is not within the control of the applicants. The site needs to be self-sufficient in parking in case things change in the future to ensure the development is future proof.
115. Taking the above into account, officers consider the applicant has provided clear justification for the level and type of parking proposed as part of the application in accordance with policies TI/3 and HQ/1.

Cycle Parking

116. The proposal would provide 30 cycle parking spaces at the site comprising 15 covered and secure Sheffield Stands. The proposed development will also provide changing facilities including showers and lockers. Visitor cycle parking is sited at the front of the site and staff cycle parking is sited within the staff car parking area to ensure security.
117. Residents have raised concerns that the amount of cycle parking proposed is too low. The cycle parking for the proposed development has also been calculated using a first principles approach, similar to that which was applied to the car parking provision. As part of the travel survey, it was identified that 15% of staff intend to travel to the site by bicycle. This represents a high mode share for cycle travel given the site's location and it is therefore a robust figure upon which to base the cycle parking provision.
118. It should be noted that the applicant has outlined in the Travel Plan that additional cycle parking will be provided should the demand from staff increase. The site plan identifies an area of car parking that is designated for future cycle parking if required. Taking the above into account, officers consider the proposed level and type of cycle parking proposed as part of the application to be in accordance with policies TI/3 and HQ/1.

Traffic

119. The proposed development is located immediately south of Milton Park-and-Ride which is itself located immediately west of the A10. The proposed development will be accessed via a new junction from the existing Park & Ride access road. This junction will be located approximately 50m west of the A10 and will provide a 20m right turn 'pocket' for vehicles turning right into the site providing sufficient length for four cars to wait to turn right into the site. The right turn lane has been achieved by adjusting the lane widths and reducing the size of the existing island in this location. The proposed police station will employ 388 total staff of which a maximum of approximately 202 are expected to be on

site at any one time during a peak shift change. The shift changes are considered to fall outside of the peak times on the A10.

120. The Transport Assessment Team and Development Management Team at the Local Highway Authority has assessed the submitted Transport Assessment, its addendum and the findings of the Stage 1 Road Safety Audit. This sets out the trip generation for the proposed development. This methodology is accepted by the Transport Assessment Team. The development is anticipated to generate 46 vehicular movements in the network AM peak and 67 vehicular movements in the network PM peak. A traffic impact analysis has been undertaken by the applicant in regard to the A10/Butt Lane/Park & Ride signalled network and the Butt Lane/Park & Ride priority junction. The assessment demonstrates that the Butt Lane/Park and Ride priority junction is anticipated to operate within capacity.
121. Residents have raised questions about how the access arrangements will work when the Park and Ride is in use by parked cars. The access is located away from the parking bays within the Park and Ride. The Transport Assessment Team have recommended the applicant undertake signal timing review works in coordination with the County Council across the A10/Park and Ride signal network with the aim to reduce queues on the Park and Ride to ensure this runs smoothly and doesn't result in blocking or delays. The Transport Assessment Team agree with the conclusions that the development will not cause detriment to the capacity at the A14 interchange.

Mitigation

122. As part of the proposals, the applicant will deliver the following:
 - A 3.0m wide shared footway/cycleway connecting the proposed development to the existing shared footway/cycleway along Butt Lane
 - A 2.0m wide footway connecting the proposed development to the existing Park & Ride terminal
 - 30 sheltered and secure cycle parking spaces
 - Travel Plan
 - Signal timing review works to be undertaken by the applicant in coordination with the County Council prior to occupation of the development. Such works are essential to mitigate queues on the P&R arm from blocking back and preventing access to the right turn box into the CSPA site.
123. The Travel Plan aims to reduce the number of staff commuting to and from the proposed development site by single occupancy car.
124. Comments have been raised about the low parapet wall on the A10 bridge. The Transport Assessment Team have not raised any concern about this, neither have they requested any improvements to this bridge in order to make the development acceptable in planning terms.
125. Subject to the recommended conditions, officers are satisfied that the development is acceptable in highway safety terms and would accord with

policies HQ/1 and TI/2 of the Local Plan and paragraphs 108 and 110 of the NPPF.

Residential Amenity

Fear of crime

126. Milton Parish Council and residents have raised concerns about the fear of crime: 'The surrounding area is poorly lit. There is potential for increased anti-social behaviour including drug dealing in Butt Lane/Coulson Close area similar to that currently experienced in the Parkside area, which could discourage pedestrian and cycling activity.'
127. The existing police station at Parkside in the centre of Cambridge and the proposed station on the outskirts of Milton are not equally comparable due to differences in context. No evidence has been provided to substantiate claims of drug dealing near the Parkside Police Station nor that it is caused directly by the presence of Parkside Police Station. No evidence has been submitted to demonstrate the new police station will attract such behaviour.
128. The fear of crime is centred around the release of people from custody into Milton, particularly after public transport has stopped running and these concerns are understandable. The applicant has submitted a Statement of Community Involvement and a document titled 'Introduction to Police Custody' which attempts to address these concerns.
129. These supporting documents set out that all detainees that are released from police custody are subject to a risk assessment prior to release. Where a person is classed as vulnerable, it is often the case that the person is released in the company of friends, family, legal advisors, appropriate adults or other people responsible for their on-going welfare. Those remanded in custody as a result of appearing at a virtual court will be transported directly to prison or other secure accommodation by a contracted private security company, should they be further remanded by the courts.
130. The risk assessment will ask whether detainees have the ability to get home and the police create a travel plan with them – either through friends/family etc or via public transport. If there is no option to be picked up, or if public transport is not running, the police examine as to whether a taxi is possible. If there is no way for them to safely get home and there is a concern about their safety, the risk assessment would consider direct transport by the police to a safe location, however this would be in exceptional circumstances.
131. With the growing use of virtual courts, it will sometimes be the case that those remanded in custody will be released directly from the new hub. This is already the case at Thorpe Wood and at Parkside, where people are released directly into the community – however, these detainees will undergo the same risk assessments.

132. Therefore, no one will be released unless they have been subject to a pre-release risk assessment to mitigate any further risk to themselves or the wider community. Once they have left custody, however, the police have no power to enforce their chosen route home.
133. The proposed police station would operate 24 hours a day, resulting in more movements to and from the site at times when the Park and Ride is currently very quiet. This would introduce a level of surveillance that does not exist at present. It is expected that a police presence in the local area should act as a deterrent for crime. If any crimes were committed or this fear of crime came to fruition, that would be a police matter for investigation.
134. Officers acknowledge and understand the concerns raised by Milton Parish Council and residents, however, taking the above into account, officers do not consider that fear of crime warrants a refusal of the application as per paragraph 91 of the NPPF or local plan policy HQ/1 (o).

CCTV contributions

135. The Parish Council consultation response requests for CCTV on the A10 bridge which should be monitored 24*7 to evaluate any need for further enhancements, improved surveillance at the Park & Ride, and other items beneficial to Milton residents. No details have been provided in relation to what other items Milton Parish Council requests this to be funded from section 106 contributions.
136. The CIL regs for S106 contributions sets out 3 statutory tests a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –
- (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.
137. The S106 Officer has considered this request and comments that such a request could satisfy (a) subject to material planning considerations, could satisfy (b) and/or surveillance would be installed within a short distance of the site on or adjacent public highway linking the site to the village and/or serving the park and ride site but currently fails to satisfy (c) as no capital costs have been submitted in relation to the request. There are often maintenance costs associated with the inspection of such infrastructure. Furthermore the 24/7 monitoring of additional CCTV cameras would introduce new costs for the operator meaning commuted sums would also likely be required. The absence of such information means that it would not be possible to calculate the expected level of contribution.
138. The S106 Officer also raises a number of questions such as:
- Precisely where would such CCTV infrastructure be located
 - Who is the owner of that land and/or infrastructure

- What is their view as to the request
- Who would be responsible for delivery
- Who is responsible for maintenance
- Who would be responsible for monitoring the CCTV camera's
- Methodology for calculating any financial contribution

139. Given the conclusions reached above in regards to the fear of crime, officers consider that additional CCTV coverage is not necessary to make the development acceptable in planning terms and therefore fails to satisfy part (a) of the 3 statutory tests of the CIL regs for S106 contributions. If members were to conclude that additional CCTV coverage is necessary, officers would ask for delegated powers to further ascertain whether such mitigation is technically capable of being carried out and maintained with third party agreement on land outside the control of the applicant and within reasonable cost parameters and that the securing or not of this mitigation via condition or S106 is also delegated.

Noise

140. The Transport Assessment states that vehicles are only very rarely anticipated to need to leave the new police station under a blue light as the majority of incidents are responded to by vehicles which are already on patrol.

Conclusion

141. While officers acknowledge the concerns raised by residents and the Parish Council, officers consider the proposal to accord with policy HQ/1 of the Local Plan which requires development to protect the health and amenity of occupiers and surrounding uses from development.

Other matters

Public facing offices

142. Concerns have been raised about the retention of public facing offices for the police not remaining in the city. Cambridgeshire Constabulary have confirmed they will retain a city centre station to deal with such enquiries. The location of this is yet to be decided and further details will be provided in the future.

Blocking of the access road by activists/terrorists

143. Concerns have been raised about how the single access road leaves the potential for activists/terrorists to block the site. The pedestrian access into the Park and Ride will also act an emergency vehicular access if such a situation arose.

Communications strategy

144. No communication masts are proposed as part of the development.

Conclusion and Planning Balance

145. Planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (section 70(2) of the Town and Country Planning Act 1990 and section 38[6] of the Planning and Compulsory Purchase Act 2004). Whilst contrary to policy S/7 (there is no express policy supporting this type of development outside the framework boundary), material considerations including the operational need and advantages of this particular site, its landscape characteristics and value, immediate land use context and the public benefits that would arise, suggest that there are material considerations which weigh in favour of departing from the provisions of policy S/7 in supporting the proposal.
146. Officers consider the applicant has undertaken a robust assessment of the police force's operational needs which has led them to conduct an acceptable site search. It is considered that the site south of the Milton Park and Ride would result in the least harm upon the Green Belt compared to the shortlisted sites. Officers consider that the application has demonstrated very special circumstances necessary to outweigh the 'inappropriateness' in accordance with paragraph 144 of the NPPF and policy S/4 of the Local Plan. Other harm that arises from the loss of agricultural land and limited landscape harm including direct conflict with policy S/7 are outweighed by the public benefits arising from the proposal which include an improved police service:
- Local Policing Review objectives
 - Modernising police services
 - Meeting operational imperatives
 - Deliverability due to site availability
 - Securing sustainable development
147. The development is acceptable in terms of appearance, landscape, flood risk and residential amenity impacts. The proposed parking provision has been robustly justified and the traffic impact is considered to be acceptable. The scheme would be built in accordance with BREEAM principles.
148. For the reasons set out in this report, officers have considered the planning balance and recommend that the Planning Committee approves the application subject to conditions.
149. Under the Town and Country Planning (Consultation) (England) Direction 2009 there is a requirement for the application to be referred to the Secretary of State before any permission can be issued because of the size and location of the development in the Green Belt. The Secretary of State has the power to call-in the application for his own determination following any referral. The application will be required to be referred to the Secretary of State under this Direction if Members of the Planning Committee are minded to support the officer recommendation.

Recommendation

150. The recommendation is to **APPROVE** the proposal subject to:

- a) Consultation with and confirmation from the Secretary of State that the application is not to be called in for his determination; and
- b) The planning conditions as set out below

Conditions

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

- 2 The development hereby permitted shall be carried out in accordance with the approved plans as listed on this decision notice.

Reason: In the interests of good planning, for the avoidance of doubt and to facilitate any future application to the Local Planning Authority under Section 73 of the Town and Country Planning Act 1990.

- 3 No development above ground level, other than demolition, shall commence until details of all the materials to be used in the development, including brickwork, cladding, ground surface finishes details and samples of all materials and finishes shall be submitted to and approved in writing by the Local Planning Authority prior to the construction. The development shall be carried out in accordance with the approved details.

Reason - To ensure the appearance of the building is acceptable in accordance with Policy HQ/1 of the Local Plan

- 4 No development above ground level, other than demolition, shall commence until full details of both hard and soft landscape works have been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out as approved. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts, other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (e.g. furniture, refuse or other storage units, signs, lighting). Soft Landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate and an implementation programme.

Details specific to this condition shall also include:

- a) Outdoor cafe terrace
- b) Refuse storage

- c) Street furniture
- d) Attenuation basin
- e) Headwalls and culverts
- f) SOCO storage
- g) Substation
- h) Main store

All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with a programme agreed in writing by the Local Planning Authority. The maintenance shall be carried out in accordance with the approved schedule. Any trees or plants that, within a period of five years after planting, are removed, die or become in the opinion of the Local Planning Authority, seriously damaged or defective, shall be replaced as soon as is reasonably practicable with others of species, size and number as originally approved, unless the Local Planning Authority gives its written consent to any variation.

Reason: In the interests of visual amenity and to ensure that suitable hard and soft landscape is provided as part of the development. (Cambridge Local Plan 2018 policies 55, 57 and 59)

- 5 Prior to first occupation or the bringing into use of the development, hereby permitted, a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all landscaped areas, other than small privately owned domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority. The landscaped areas shall thereafter be managed in accordance with the approved details.

Reason: In the interests of visual amenity and to ensure that suitable hard and soft landscape is maintained as part of the development. (Cambridge Local Plan 2018 policies 55, 57 and 59)

- 6 No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Ecological Management Plan (CEcMP) has been submitted to and approved in writing by the local planning authority. The CEcMP shall include the following:

- A) Risk assessment of potentially damaging construction activities.
- B) Identification of "biodiversity protection zones".
- C) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- D) The location and timings of sensitive works to avoid harm to biodiversity features.
- E) The times during which construction when specialist ecologists need to be present on site to oversee works.
- F) Responsible persons and lines of communication.

G) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

H) Use of protective fences, exclusion barriers and warning signs if applicable.

The approved CEcMP shall be ahead to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

- 7 A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and approved in writing by, the local planning authority prior to the commencement of development above slab level. The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management, including how a minimum of 10% in biodiversity net gain will be achieved.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Prescription of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organisation responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results form monitoring show that conservation aims and objectives of the LEMP are not being met) contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

- 8 No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work which has been secured in accordance with a written scheme of investigation (WSI) which has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed WSI, which shall include:

- a) the statement of significance and research objectives;
- b) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
- c) The timetable for the field investigation as part of the development programme;

d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material

Informatives:

Partial discharge of the condition can be applied for once the fieldwork at Part c) has been completed to enable the commencement of development.

Part d) of the condition shall not be discharged until all elements have been fulfilled in accordance with the programme set out in the WSI.

Reason - To ensure that the significance of historic environment assets is conserved in line with NPPF section 16

- 9 In the event of the foundations for the proposed development requiring piling, prior to the development taking place the applicant shall provide the local authority with a report / method statement for approval detailing the type of piling and mitigation measures to be taken to protect local residents noise and or vibration. Potential noise and vibration levels at the nearest noise sensitive locations shall be predicted in accordance with the provisions of BS 5528, 2009 - Code of Practice for Noise and Vibration Control on Construction and Open Sites Parts 1 - Noise and 2 -Vibration (or as superseded). Development shall be carried out in accordance with the approved details.
- 10 No development shall commence until a programme of measures to minimise the spread of airborne dust (including the consideration of wheel washing and dust suppression provisions) from the site during the construction period or relevant phase of development has been submitted to and approved in writing by the Local Planning Authority. Works shall be undertaken in accordance with the approved details / scheme unless the local planning authority approves the variation of any detail in advance and in writing.
- 11 No development shall commence until a noise assessment and a scheme for the insulation of the building(s) and/or associated plant / equipment or other attenuation measures including any renewable energy provision sources such as any air source heat pump, in order to minimise the level of noise emanating from the said building(s) and/or plant shall be submitted to and approved in writing by the local planning authority. The scheme as approved shall be fully implemented before the use hereby permitted is commenced and shall thereafter be maintained in strict accordance with the approved details. Any assessment of impacts on residential properties from externally mounted plant and equipment must be carried out in accordance with BS:4142 (2014) or as amended.

Reason - To protect residents from noise disturbance in accordance with Policy SC/10 of the Local Plan

- 12 The external lighting scheme as detailed in the External Lighting Environmental Strategy, Cambridge Southern Police Station, Cambridgeshire

Constabulary (Ref: DMN/ADD/RBR/200684/17-2/R001, Issue Number 01, dated September 2020) and the Cambridgeshire Southern Police Station, External Lighting, Lighting Plots for Planning (Drawing No. 200684-PEV-ZZ-ZZ-DR-E-0801, Job No. 200684 and dated 20th August 2020) prepared by Pick Everard Engineers shall be installed, operated and thereafter retained in accordance with the details / measures submitted.

Artificial lighting on and off site 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).

Reason -To minimise the effects of light pollution on the surrounding area in accordance with Policy SC/9 of the Local Plan

- 13 If during the development contamination not previously identified is found to be present at the site, such as putrescible waste, visual or physical evidence of contamination of fuels/oils, backfill or asbestos containing materials, then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved to the satisfaction of the Local Planning Authority.

Reason - To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy SC/11 of the adopted South Cambridgeshire Local Plan 2018.

- 14 No gas fired combustion appliances shall be installed until details demonstrating the use of low Nitrogen Oxide (NOx) combustion boilers, (i.e., individual gas fired boilers that meet a dry NOx emission rating of $\leq 540\text{mg/kWh}$), have been submitted to and approved in writing by the local planning authority.

If the proposals include any gas fired Combined Heat and Power (CHP) System, the details shall demonstrate that the system meets the following emissions standards for various engines types:

- (i) Spark ignition engine: less than or equal to 150 mg NOx/Nm³
- (ii) Compression ignition engine: less than 400 mg NOx/Nm³
- (iii) Gas turbine: less than 50 mg NOx/Nm³

The details shall include a manufacturers Nitrogen Oxides (NOx) emission test certificate or other evidence to demonstrate that every appliance installed meets the emissions standards above. The approved appliances shall be fully installed and operational before the

development is occupied or the use is commenced and retained as such.

Reason : To protect local air quality and human health by ensuring that the production of air pollutants such as nitrogen dioxide and particulate matter are kept to a minimum during the lifetime of the development in accordance with policy SC/12 of the South Cambridgeshire Local Plan 2018.

- 15 No construction works shall commence on site until a construction traffic management plan has been submitted to and agreed in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.
- (i) Movements and control of muck away lorries (all loading and unloading shall be undertaken off the adopted highway)
 - (ii) Contractor parking, for both phases all such parking shall be within the curtilage of the site and not on the street.
 - (iii) Movements and control of all deliveries (all loading and unloading shall be undertaken off the adopted public highway.
 - (iv) Control of dust, mud and debris, in relationship to the functioning of the adopted public highway.

Reason: in the interests of highway safety

- 16 Prior to the commencement of the first use the vehicular access where it crosses the public highway shall be laid out and constructed in accordance with the Cambridgeshire County Council construction specification.

Reason: In the interests of highway safety and to ensure satisfactory access into the site.

- 17 The access hereby approved shall be constructed using a bound material for the first 6m from the back of the adopted public highway, to prevent debris spreading onto the adopted public highway. Once constructed the access shall thereafter be retained as such.

Reason: In the interests of highway safety.

- 18 The access hereby approved shall be constructed so that its falls and levels are such that no private water from the site drains across or onto the adopted public highway. Once constructed the access shall thereafter be retained as such.

Reason: To prevent surface water discharging to the highway, in the interests of highway safety

- 19 Prior to the commencement of the use hereby permitted the off-site highway improvement works as shown on drawing number:1003.0003.001 Rev E shall be completed to the satisfaction of the Local Planning Authority in consultation with the Highway Authority.

Reason: to ensure that the highway network is adequate to cater for the development proposed.

- 20 Prior to occupation of the development, the applicant shall undertake physical signal improvement works in coordination with the County Council across the A10/Milton Park & Ride signal network including the Butt Lane junction. Signal works shall broadly involve re-cutting and re-configuring the detector loops on the side road to match any changes in lane positions from the physical works. Works to be undertaken by the applicant. The applicant shall also undertake a MOVA signal timing review in coordination with the County Council across the A10/Milton Park & Ride signal network including the Butt Lane junction when the development is within a sizable number of trips generated; such threshold to be agreed with the County Council.

Reason - In the interest of highway safety

- 21 Prior to occupation of the development, the applicant shall be responsible for the provision and implementation of a Travel Plan to be agreed in writing with the Local Planning Authority. The Travel Plan shall include the provision of cycle discount vouchers and/or bus taster tickets. The plan is to be monitored annually, with all measures reviewed to ensure targets are met.

Reason - To reduce car dependency and to promote alternative modes of travel in accordance TI/2 of the Local Plan

- 22 No development hereby permitted shall be commenced until a Detailed Design stage surface water drainage scheme for the site, based on sustainable drainage principles and in accordance with local plan policies, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is occupied.

The scheme shall be based upon the Outline Design stage principles within the agreed Drainage Strategy Report prepared Pick Everard, Rev 02, dated 18/09/2020 Updated to Revised Site Layout plus revised outfall arrangements into a new swale CSCP2-PEV-XX-XX-DR-C-0550 and shall also include:

- a) Details of the existing surface water drainage arrangements including runoff rates for the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events;
- b) Full results of the proposed drainage system modelling in the above-referenced storm events (as well as 1% AEP plus climate change) , inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with a schematic of how the system has been represented within the hydraulic model;
- c) Detailed drawings of the entire proposed surface water drainage system, including levels, gradients, dimensions and pipe reference numbers;
- d) A plan of the drained site area and which part of the proposed drainage system these will drain to;
- e) Full details of the proposed attenuation and flow control measures;

- f) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants;
- g) Full details of the maintenance/adoption of the surface water drainage system;
- h) Measures taken to prevent pollution of the receiving groundwater and/or surface water
- i) Formal agreement from a third party for discharging into the proposed new ditch including long term maintenance arrangements.
- j) The drainage scheme must adhere to the hierarchy of drainage options as outlined in the NPPF PPG

Reason - To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development

23 10% Carbon Reduction from Renewables

The approved renewable/low carbon energy technologies (as set out in the Sustainability & Energy Statement) shall be fully installed and operational prior to the occupation of the development. Full detailed design stage SEBM calculations shall be submitted demonstrating that a 10% reduction in CO2 emissions below the Target Emission Rate of the 2013 edition of Part L of the Building Regulations has been achieved, via the installation of the approved technologies, and shall include the following details:

- Levels of carbon reduction achieved at each stage of the energy hierarchy;
- A summary table showing the percentage improvement in Dwelling Emission Rate over the Target Emission Rate for each proposed unit
- A schedule of proposed on-site renewable energy technologies, their location, design, and a maintenance program

Where grid capacity issues subsequently arise, written evidence from the District Network Operator confirming the detail of grid capacity and a revised Energy Statement to take account of this shall be submitted to and approved in writing by the local planning authority. The revised Energy Statement shall be implemented development and thereafter maintained in accordance with the approved details

Reason: In the interests of reducing carbon dioxide emissions in accordance with Policy CC/3 of the South Cambridgeshire Local Plan 2018 and the Greater Cambridge Sustainable Design and Construction SPD 2020.)

24 BREEAM

Within 6 months of commencement of development, a BRE issued Design Stage Certificate shall be submitted to, and approved in writing by, the Local Planning Authority demonstrating that BREEAM 'Very Good' as a minimum

will be met. Where the certificate shows a shortfall in credits for BREEAM 'Very Good', a statement shall be submitted identifying how the shortfall will be addressed. If such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

(Reason: In the interests of reducing carbon dioxide emissions and promoting principles of sustainable construction and efficient use of buildings (Greater Cambridge Sustainable Design and Construction SPD 2020)).

25 BREEAM – Post construction

Prior to the use or occupation of the development, a BRE issued post Construction Certificate shall be submitted to, and approved in writing by the Local Planning Authority, indicating that the approved BREEAM rating has been met. In the event that such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

(Reason: In the interests of reducing carbon dioxide emissions and promoting principles of sustainable construction and efficient use of buildings (Greater Cambridge Sustainable Design and Construction SPD 2020)).

Background Papers

The following list contains links to the documents on the Council's website and / or an indication as to where hard copies can be inspected.

- South Cambridgeshire Local Plan 2018
- South Cambridgeshire Supplementary Planning Documents (SPDs)

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