

**NO MILL ROAD TESCO CAMPAIGN COMMENTS ON THE PLANNING OFFICER'S  
REPORT FOR APPLICATION 08/0794/FUL**

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## Summary

We strongly disagree with both the planning officer's conclusions and the basis for those conclusions. Although we welcome the attention paid in the report to the many objections to the application, we are concerned that the report fails to engage with the substance of these objections. This is of particular concern in relation to the very serious problems identified in the applicant's acoustic report, which have not been addressed (or even acknowledged, in some cases), and which, it seems clear to us, must reasonably be considered to preclude approval.

Below, we address the report in detail. In summary, we consider the planning officer's recommendation to be incorrect for the following reasons:

### **1. The planning officer is incorrect that deliveries, car parking, waste, and other matters are not relevant to the decision**

The planning officer has asserted that, as this is an application only for the installation of plant, the impact of deliveries on road safety, congestion, car parking, and noise pollution are not relevant to this application. The planning officer also says that all the other issues objectors have identified, except those relating explicitly to the issue of the air conditioning and refrigeration plant itself, are all irrelevant. This is not correct.

By the applicant's own account, approval of the current application would necessarily lead to the opening of the proposed store, whereas refusal will mean that the proposed store cannot open. **A direct and necessary consequence of approval would therefore be the implementation of the applicant's delivery plans and the other aspects of the proposed operation of the store that the council previously considered unacceptable. These matters – for example, the negative impacts of proposed deliveries, and of waste and other storage – are clearly material to consideration of this application.**

### **2. The planning officer has ignored the fact that Tesco's acoustic report, on which the recommendation is based, is fundamentally flawed in its methodology, tests, analysis, and conclusions, and that it is not consistent with the relevant acoustic standard and thus with the relevant planning guidance.**

Please see our separate document on the acoustic report for reasons why this is the case. We do not, as we have said, agree that matters other than those relating very specifically to the operation of the proposed plant should be ignored. Even if we were to take this view, however, it is clear to us that the application should be refused because consideration of the noise impacts of the plant rests wholly on a report which cannot reasonably be considered accurate or reliable.

**3. Approval of this application would be inconsistent with the council's refusal of the previous application in respect of this site, and thus with its defence of this refusal at appeal.**

We understand that the planning officer's view is that since the stated grounds for refusal of the previous application pertained to the extension not the plant, approval of the current application would not be inconsistent with the previous refusal and would not jeopardise the council's position at appeal. This does not seem to us to be a safe inference.

As we set out below and in our objection document, the applicant has stated that approval of this application would lead to the opening of an Express format store at 163-167 Mill Road, irrespective of the outcome of the appeal(s). This means that, as noted above, effects such as deliveries to the site would follow as a direct consequence of approval of this application. As you will remember, although the previous applications included details of delivery proposals, which were clearly material to the applications, the applications themselves were for plant and extension, not for deliveries. Deliveries were, rather, understood to be a direct consequence of approval of the application. This means that they stood in the same relationship to the previous application as they do to the current one. That refusal on these grounds was previously linked by the council to the proposed extension does not alter the fact that, as before, delivery plans contributing to the refusal of a previous application must be assumed to have remained unchanged and will unquestionably follow from approval of the current application.

As a result, any approval of the current application will generate the same effects in terms of, for example, deliveries, as would have been generated by approval of the previous application. Since the council refused the previous application in part on grounds concerned with deliveries, it would be inconsistent with their previous decision to now approve an application that will have an identical effect.

**It would also, in our judgement, be impossible to defend at appeal a refusal that had been given on the grounds that an activity resulting from approval would be impermissible, when the council had, in the context of another application, granted *de facto* approval of that same activity by the same applicant on the same site.**

## **The Detail of the Report**

For greater clarity, our comments follow the structure of the report itself, with comments referring to the report's numbered paragraphs. Text from the officer's report appears in blue.

For clarity, issues arising from the acoustic report are considered in a separate document.

We would also refer you to our objections document and to our submission to the planning inspectorate which, although in respect of a different application, summarises our position on matters of deliveries and waste storage, which also apply in this case. Please let us know if anything here requires further clarification or if you would like us to resend you copies of any of our documents.

### **1.0 SITE DESCRIPTION/AREA CONTEXT**

1.2 [...] The rear access to/egress from the site is about 30 metres north of the junction with Mill Road, through a gap of about 9 metres between single storey outbuildings to the rear of (and belonging to) 161, and 2/2a Sedgwick Street a building extended with a long and tall blank flank south facing wall to the car park. [...]

Importantly, the boundary of the site not only meets 2 Sedgwick Street along the building's flank, but along the length of its garden, from which it is separated by a low brick wall and, on top, a wooden fence (see photograph 3 in Appendix 1). Obviously, any noise to the rear of the site carries directly into this part of the property (as it does into the rooms that face onto the garden), and into the adjoining gardens in Catherine Street.

The parking spaces within the site appear to be allocated to the shop and the offices at first floor level, though site visits have suggested that other parties living/working nearby may also be using some spaces on occasion [...]

As the attached photographs 1 -3 in Appendix 1 clearly show, 3 of the car parking spaces in the tarmac-covered area and 3 spaces in the gravel-covered area to the east of the site are marked as allocated to, respectively, the first floor offices and the estate agents at 169 Mill Road. As data collected by one local resident has shown, and as is, in any case, common knowledge, the car park is, additionally, very well used by parties other than the businesses above and next to the site.

There have also been some large orange or blue 'paladin' refuse bins stored at the area immediately to the rear of the shop.

As discussed in our objections to this and previous applications, although this is correct, it is relevant that at no point in the recent history of the use of the site (the current squat excepted) have bins stored in the car park and delivery area been for the storage of food waste. External storage of food waste would thus be a departure from previous practice at the site.

1.4 The ground floor of 163-167 was last occupied by Wilco Motorists Discount Store, and has recently been occupied by a 'social centre' operating without the benefit of planning permission.

It should be noted that squatters have been occupying the building for more than two months. Six weeks ago, in mid-June, Tesco were awarded a possession order but have not, for some reason, chosen to take any steps to remove the squatters. As we noted at the time of their first occupation of the site, the squatters' ability to access the site in the first place was clear evidence of the applicant's failure to act as a responsible tenant by not securing the building.

## **5.0 POLICY**

Most of the key issues involved in this application remain unchanged from the previous application (for example, the impact on highway safety, congestion, and noise pollution of the applicant's proposed servicing arrangements). Thus, all those aspects of local and national guidance that were previously applicable – other than those that relate specifically to extensions – remain relevant to this application.

We note that the planning officer regards guidance including PPG13 and sections of the Cambridge Local Plan concerning transport impact and car and cycle parking as pertinent to the current application. We entirely agree, and note that this is clearly not consistent with the officer's (incorrect) view, given elsewhere in this report, that such matters are *not* relevant to this application

### **5.4 PPG13 Transport (2001):**

The planning officer notes the relevance of the key objectives of PPG13. Other advice in PPG13 which is relevant to the current proposals, including delivery plans (which follow as a direct consequence of approval of the current application) includes the following:

- That the safety of pedestrians, cyclists and other road users is a fundamental concern of the planning system (29);
- That parking "is important to maintain the vitality and viability of town centres, and to enable retail and leisure uses to flourish" (51, paragraph 4);
- That the safety and security of pedestrians must be ensured in the context of broader requirements to promote walking (75-77);
- That cycling should be promoted, in part by restricting heavy goods vehicles on certain routes (80).

### **5.13 Cambridge Local Plan 2006**

#### **4/13 Pollution and amenity**

As we noted in our objections to the current application, the Local Plan is clear that "The potential risk and significance of pollution will be considered when assessing planning applications. Prevention of pollution is better than mitigation", (paragraph 4.48). This, the Local Plan makes clear, includes noise pollution. As we also discussed in our objections and as we discuss in more detail in the document on the applicant's acoustic report, this application is not, in its current form, consistent with this aspect of local planning guidance because any meaningful assessment of noise impacts is impossible where the only available acoustic assessment entirely ignores delivery noise and is flawed, and thus entirely unreliable, in its assessment of plant noise.

#### 8/2 Transport impact

We agree that this is relevant, although we note again that its inclusion conflicts with the planning officer's views given elsewhere in the report that such matters are not relevant to this application. Obviously, 8/9 is also relevant to this application, since approval would, by the applicant's own account, necessarily lead to the servicing of the site.

#### 8/6 Cycle parking

We note, in this context, that the applicant now appears to have decided not to install any cycle parking at all. This is obviously, at best, very poor practice on the part of the applicant.

#### 8/10 Off-street car parking

The installation of plant would entail the removal of some on-site car parking. When combined with the high volume of external storage that is standard Tesco practice in small Express format stores (please see our note on this) and the proposal to deliver to the rear of the site, it will result in the effective removal of all on-site parking. As we have noted before, the Local Plan and Council Car Parking standards (which are, obviously, also relevant) are clear that reductions in car parking need to occur "in parallel with improvements in the provision of alternative modes of transport" (Local Plan paragraph 8.23). The Council's Parking Standards state that parking levels "may be reduced where lower car use can reasonably be expected" (1.1) and that car parking levels below the Standards will be supported where measures have been put in place "to ensure that increased on-street parking pressure will not occur". (1.6c) Clearly not only is this not the case with the current application, but the evidence we have collected from other Tesco Express stores in Cambridge is that the proposed store would significantly *increase* car use in relation to the site. Since there are no measures in place to ensure that on-street parking pressure would not occur (and, indeed, the applicant proposes to seek the removal of a number of on-street parking spaces), it is clear that the removal of on-site parking facilities is not consistent with the council's own Parking Standards.

## 6.0 CONSULTATIONS

### Cambridgeshire County Council (Engineering)

#### 6.1 No Comment.

We find it both surprising and unfortunate that an application which, if approved, would lead to a level of site servicing unprecedented in this area of Cambridge and in relation to a site for which there exists no means of servicing in the manner proposed by the applicant, merits no comment from the Highway Authority.

#### Head of Environmental Services

#### 6.2 No objection subject to conditions. The full initial comments of the Environmental Health Officer are [...]

This is not quite correct. The planning officer has omitted one sentence of the Environmental Health Officer's (EHO) report. This additional sentence states, incorrectly, that "measured background noise levels have been undertaken over a period of 24 hours". Our document on the acoustic report explains why this is, at best, very unlikely to be correct. This is important because it means that the

EHO's assessment of the acoustic report's findings is based on an incorrect assumption about the scope of the research underpinning the report. This alone raises questions about the EHO's conclusions regarding the noise impact of the proposed plant.

Please see our document on the acoustic report for an explanation of why all the subsequent sections of 6.2, including the conditions suggested in respect of the plant operation, are incorrect, and thus not a valid basis for recommending approval. As our document also explains, one of the reasons for this is that the assessment does not, in fact, meet the requirements of a BS4142 assessment, as planning guidance (PPG 24) requires.

[...]

- **Except with the prior agreement of the local planning authority in writing, there should be no collection or deliveries to the store outside the hours of 0700 and 2300**

Reason: To protect the amenity of nearby residential properties. (Cambridge Local Plan 1996 policies EO1 and BE2)

We note that the EHO considered delivery noise sufficiently relevant to the application to recommend a condition limiting the hours of deliveries. We are therefore very surprised that the EHO has made no comment at all about the noise impacts of deliveries, and has, in particular, given no view on the detailed assessment of delivery noise presented by our acoustic consultant. This highlighted the very severe noise pollution impacts of proposed deliveries on local residents. It is not clear, in other words, why the EHO has reached the conclusion that a condition needs to be recommended, how severe they expect the noise pollution to be, and therefore, why they are confident that a condition limiting delivery hours would be sufficient to address the problem.

We are both surprised and concerned that the council officers responsible for assessing the noise impact of the application have not addressed the fundamental problems associated with the applicant's acoustic report. We have passed these comments back to our acoustic consultant, who is disturbed by the officers' failure to engage with the technical questions he has raised. It is our view that the fundamental, unresolved (indeed, unresolvable) problems with the report – the only evidential basis for consideration of the plant – must reasonably preclude approval of the application. Please see the attached document for an explanation of why this must necessarily be the case.

## 7.0 REPRESENTATIONS

**In addition to the in excess of 100 correspondents referred to above, a further 42 emails have been received without full address details.**

We have counted 160 objections in the application file (ignoring duplicates), and are investigating reports that some further letters of objection are not in the file.

### No details of Public Transport (in) accessibility

- the consequence is that most customers will try to access the site by car causing serious difficulty and disruption

As far as we are aware, the most frequently made point is not that most customers would access the store by car, but that those shoppers *not arriving on foot or bicycle* would access the store by car. The applicant has previously stated that they expect the majority of shoppers to visit the store on foot and this is

consistent with our monitoring of the Cherry Hinton Express, which found that a majority of visitors to the store appeared to arrive on foot (although it is not clear what proportion of visitors parked in the site car park, 20% arrived by car and parked on the street). However, this still means that a significant proportion of shoppers – all those not visiting on foot or bicycle, since public transport is not a credible option for accessing the store – would visit the store by car. Even without the removal of any on-site parking, this would place significant additional pressure on on-site and on-street car parking. With the effective removal of all on-site parking and the intended removal of some on-street parking, residential amenity, traffic flow, and highway safety would all be significantly, and negatively affected. This would, in turn, have a negative impact on vitality and viability of the Mill Road centre as a whole.

## 8.0 ASSESSMENT

### Principle of Development

[...]

- 8.4 The introduction of the plant to the site is a proposal which is part of a process of bringing a currently vacant Class A1 premises, within an identified District Centre, back into retail use. That consolidation of the retail position within District and Local Centres is encouraged by local and national policy.

It is unclear why the planning officer considers this relevant to a consideration of the application, since their stated view is that only issues relating directly and specifically to the installation of the proposed plant are relevant. Certainly, it seems inconsistent to hold the position that the issue of "consolidation of the retail position" in the Mill Road Local Centre is relevant to this application when matters such as deliveries are not.

It should be noted, in passing, that since the site was only vacated by the previous, longstanding occupiers after the applicant expressed a desire to acquire the site, the view that this application would help to bring back into use a currently vacant site (a view shared by the applicant) does not fully reflect the circumstances under which the site became vacant in the first place.

[...] the position in planning law and policy is that the identity of the occupant is not relevant to the planning decision.

As we noted in the course of the previous application for extension and plant, the relevant section of central government advice (Circular 11/95) in fact states that:

Since planning controls are concerned with the use of land rather than the identity of the user, the question of who is to occupy premises for which permission is to be granted will *normally* be irrelevant." [our italics]

As we observed in March, this does not mean that the identity of the occupier cannot be relevant; in fact, it means that the identity of the occupier *will*, sometimes, be relevant to considerations informing planning permissions. As we have argued extensively elsewhere, the identity of the user is, unusually, relevant in this case and in two ways – firstly as a grocery store replacing a car accessories store, meaning that issues of deliveries, waste, customer parking, and noise are all much more problematic than they were under the previous occupation of the site; secondly, the unique and widely publicised "just in time" delivery policy of this particular applicant raises additional issues of the impact on congestion. This was, for example, reflected in the Highway Authority's advice that deliveries to the front of the site should not be permitted because

moving deliveries across the front of the site posed a danger to pedestrians "given the level of servicing that the proposed unit is likely to generate".

[...] In this particular case it is the proposal for plant and the implications of that plant, visually and in terms of its direct impact upon the amenity of neighbours, not the name of the occupier, that is to be considered. For these reasons, I cannot share the view of objectors who argue that it is appropriate to re-open issues raised through the previous application for additional floorspace as well as plant, because the assumption is made, albeit on the basis of interpretation of words of the applicant/agent, that if the application for the plant is refused then the store will not open.

This appears to be the core of the planning officer's argument that nothing other than the direct impacts of the proposed plant can legitimately be considered in an assessment of this application. As we have set out in our objections to this application, this appears to us to be incorrect in planning terms.

The applicant has stated (and this is not an "interpretation" but a literal reading of both the Planning Design and Access Statement paragraph 1.3 and of comments made by the applicant to the local press) that if approval of this plant is given then they will open a store using the existing floorspace. Clearly, since a convenience store cannot operate without refrigeration, refusal would preclude the opening of a store. Thus, by the applicant's own account, approval would lead to the opening of a store when it could not otherwise open. Since a convenience store cannot operate without goods to sell, the opening of this store would necessarily lead to deliveries to the store. As is very well known, and as was recognised by the council in its refusal of the previous application, the applicant's proposed delivery mechanisms are not compatible with local or national planning guidance because of their negative impacts on, for example, highway safety, the free flow of traffic, and residential amenity.

**Thus, if the applicant is to be believed in their statements that approval of the current application would necessarily lead to the opening of the proposed store – and there is no evidence that the planning officer does not believe them, nor is there an obvious reason to do so – then a direct and necessarily consequence of approval would be the deliveries and other aspects of the proposed operation of the store that the council previously considered unacceptable. These matters – for example, the negative impacts of proposed deliveries, and of waste and other storage – are clearly material to consideration of this application.**

#### **Residential Amenity**

8.10 [...] the residential amenity considerations to be addressed by Committee are those arising out of the introduction of new plant and equipment proposed by the application, and not the other noise related issues raised in correspondence from objectors, for example noise associated with the unloading and movement of cages about the site.

As rehearsed above, we do not consider this to be correct. The serious, adverse noise impacts of the applicant's delivery proposals are material to this application because these deliveries would be a direct consequence of approval of this application.

8.11 and 8.12

As our document addressing the acoustic report sets out, the planning officer's conclusions here are incorrect (and some are not reflected in the views of EHO as set out in the application file). This is because the acoustic report does not constitute anything approaching a credible evidential basis for judgement of the application.

[...] In accepting the advice of the Environmental Health Officer, I am conscious that no specific reason of refusal was promoted to the plant and equipment in the previous application.

We find the planning officer's view – a view that mirrors one of the applicant's grounds of appeal against refusal of the previous application – surprising. As we set out in supplementary comments to the planning officer, in relation to this claim by the applicant, no indication was given by the council that its stated grounds for refusal of the previous application were exhaustive, and there is consequently no reason to assume that they were. We suggest that one of the reasons that the noise impacts of the application were not discussed as possible grounds for refusal was the fact that the applicant failed to provide timely information to enable councillors to make an informed decision on the subject. The applicant sent planning officers a revised acoustic report in the week of the meeting, long after the point at which it could be properly considered by the council in relation to the application. To the best of our recollection (absent a transcript of the meeting), the planning officer commented at the meeting where the application was refused that the applicant's last minute submission of information about the noise impacts of the application made it difficult to form a judgement about this aspect of the application, and that the councillors accepted that view. As our document on the acoustic report sets out, had there been sufficient time for consideration of this matter, conformity with planning guidance would have necessitated refusal on these grounds too.

### **Refuse Arrangements**

8.16 Refuse arrangements are in my opinion relevant to this application, only because the area to the rear of the buildings, which is also faintly marked out for car parking spaces is where, for many years, some external refuse storage has taken place. The proposed condenser compound and wall hung air conditioning units invade the space where paladins have been stored in the past [...]

8.17 [...] I am of the opinion that some proper and limited outside storage provision for waste, to replace the provision lost, could properly be required by condition. The corollary would be the loss of further space within the rear yard to a non car parking use which might result in the loss of car parking, which was a reason for refusal when the last application was considered, though not a matter of concern to officers, who have always been concerned that the more parking provided the greater the likelihood of customers trying to get to the store by car. It could however, be provided elsewhere, without further car parking spaces being lost, perhaps where cycle parking was previously shown.

A number of points arise from this section of the planning officer's report:

1. As rehearsed above, the issue of the likely negative impact of waste storage on residential amenity constitutes a material consideration in respect of this application.

2. As we have noted since our objection to the original application, the impact of waste storage on residential amenity in this case is clearly very different to the

impact of waste storage under the previous occupant. This is because the waste in question would include a large proportion of food waste rather than the waste generated by a discount car accessories store which, it is safe to say, was unlikely to consist primarily of food. Clearly the impact of locating bins of decomposing food close to residential properties is rather different from the impact of the close proximity to homes of bins containing, for example, damaged driving gloves.

3. The issue of external storage is not confined to the question of waste. The storage of other items, such as delivery cages, is also a significant issue in this case. As our document on the applicant's policy of large scale external storage on small Express store sites shows, approval of the current application would necessarily lead directly to a high volume of external storage at the rear of the site, with a consequent serious negative impact on residential amenity.

4. We find it unfortunate that although the applicant has stated that they have been developing a plan for a store using the existing floorspace since early March, they have still not been able to provide details of their plans for the location and volume of storage on the site. This recalls similar failures to provide timely information in respect of the last application (also concerning waste storage). The applicant has been repeatedly asked about their plans for waste storage since October 2007, in the context of three planning applications and two appeals, and they have yet to provide a clear and comprehensive answer. As we have noted before, since the applicant has more than 800 Express format stores, they must know what their waste storage arrangements for Express format stores are, and there is no reason not to provide details of them.

5. As the planning officer notes, and as we set out in our application such storage would necessarily lead to a further significant reduction in car parking spaces, contrary to the relevant planning guidance and to one of the council's grounds of refusal of the previous application.

6. The planning officer suggests that the waste could be stored where the previous application had proposed cycle parking. This is immediately behind the proposed disabled parking space marked out on drawing [P]205 submitted with the current application. As you may recall, the applicant intends to reverse their 10.35 metre delivery vehicles into the car parking spaces immediately in front of this disabled parking space. We do not think that sandwiching disabled parking between reversing 10.35 metre lorries and bins of rotting food waste is really appropriate.

#### **Highway Safety**

8.20 and 8.21

We refer you to our comments regarding 8.4, above. The proposal is not compliant with Cambridge Local Plan 8/2, nor with Local Plan 8/9 or the relevant national guidance.

#### **Car and Cycle Parking**

8.22 I do not consider there to be a requirement for car or cycle parking associated with the application for the condenser and the air conditioning plant. What is an issue is that if the plant is to be provided and in turn there is a need for additional provision for waste storage, that might result in the loss of car parking, which was previously a reason for refusal

As we have set out in our objection document, the combined installation of plant and large scale external storage, which the applicant has previously advised is a feature of stores of this size, would significantly reduce on-site car parking. Taken together with the applicant's stated delivery plans, all on-site car parking would effectively be lost if approval of this application were granted. This is, as rehearsed at length elsewhere (see, for example our statements to the planning inquiry), not consistent with either local or national planning guidance, nor with the council's previous refusal.

### **Third Party Representations**

8.26 Noise pollution is an issue but has to be considered in terms of what is proposed and the advice of the Environmental Health Officer is that it can be properly addressed by condition. [...]

As our document on the acoustic report explains, it is, in fact impossible to consider "what is proposed" since the wholly unreliable nature of the acoustic report means that there is no evidence on the subject. This is one of the reasons why it is incorrect to assert that any potential problems can be addressed by condition.

### **10.0 RECOMMENDATION**

#### **1. APPROVE subject to the following conditions:**

3. Except with the prior agreement of the local planning authority in writing, the three Mitsubishi air conditioning units hereby approved shall only operate between the hours of 0700hrs and 2300hrs Monday to Sunday.

Reason: To protect the amenity of nearby properties. (Cambridge Local Plan 2006 Policy 4/13).

Obviously, residential amenity cannot be protected by condition if there is no accurate assessment possible about the impact of the operation of these units on residential amenity.

6. Except with the prior agreement of the local planning authority in writing, there should be no collection or deliveries to the store outside the hours of 0700hrs and 2300hrs Monday to Sunday.

Reason: To protect the amenity of nearby residential properties. (Cambridge Local Plan 2006 Policy 4/13)

We were surprised to see this recommended condition, given the planning officer's views about the relevance of deliveries to this application. We understand that the planning officer has now decided to remove this suggested condition.

7. Prior to the commencement of development, full details of an on-site storage facility for trade waste, including waste for recycling shall be submitted to and approved in writing by the local planning authority to make good any space lost to the provision of the plant and equipment hereby approved. [...]

Reason: To protect the amenities of nearby residents/occupiers and in the interests of visual amenity. (East of England Plan Policy WM8 and Cambridge Local Plan 2006 Policy 4/13)

Since the stated practice of the applicant is one of very high volume external storage in Express format stores of the size proposed here, and since such a practice would conflict with the requirements to protect residential amenity and to meet planning guidance requirements in respect of car parking, we do not see how this condition could be viable. The planning officer is suggesting the imposition of a condition which could not apply in such a way as to both ensure compliance by the applicant and meet the demands of planning guidance.

8. **Reasons for Approval**

1. This development has been approved, conditionally, because subject to those requirements it is considered to generally conform to the Development Plan, particularly the following policies:

East of England plan 2008: WM8

Cambridge Local Plan (2006): 3/4, 4/13

This is not correct. As our document on the acoustic report explains, approval cannot be consistent with Cambridge Local Plan 4/13 because no informed assessment of the risks of noise pollution can be undertaken in the absence of any reliable evidence on which to base such an assessment. It would also not meet the requirements of PPG24, since the acoustic report is not consistent with the relevant acoustic standard. Approval would also not be consistent with Cambridge Local Plan 8/2, or other local and national planning guidance.

2. The decision has been made having had regard to all other material planning considerations, none of which was considered to have been of such significance as to justify doing other than grant planning permission.

This is not correct, for reasons that we have outlined at length above and in our objection document.

These reasons for approval can be a summary of the reasons for grant of planning permission only. For further detail on the decision please see the officer report by visiting the Council Planning Department.

When we consulted the application file after the publication of this report, there was no additional, longer report of which this was a summary. Thus, and as with the planning officers' report on the initial application in respect of this site, this is, apparently, a summary of a report that does not exist.