

# FeCRA – The Federation of Cambridge Residents' Associations



## Re Planning Application 19/1350/LBC Silver Street Toilets

We are writing to you on behalf of the Federation of Cambridge Residents Association (FeCRA) re the above planning application. Residents have raised significant concerns with us about these plans, and there are issues which do not seem to have been addressed in the officer report to committee.

### 1. CONSULTATION

From the start it was recognised that this is a high profile project in a sensitive area, where public consultation would be important:

#### 2/01/2016 - Environment Scrutiny Committee (Item 48)

##### (f) Consultation and communication

Consultation and communication for the project will be proportionate to the nature, scale and scope of the proposed improvement. It is anticipated that there will be widespread engagement, and consultation, with stakeholders and the public prior to a final decision being reached. The project is likely to be a sensitive one and throughout its development appropriate opportunities will be taken to publicise progress.

Since the initial consultation on the general location of the toilets in 2016 **no further open consultation** at all has taken place. The design was chosen in 2017, yet the first time the general public, local Residents Associations, Friends groups or even local councillors saw it was when the planning application was submitted in September 2019.

### 2. CHANGE OF USE

It seems generally accepted that the toilets need renovation, and the main concerns relate to the design and location of the structure above ground. The original reason this was needed was given as to provide disabled access, yet it seems the needs of disabled visitors have now been made secondary to providing revenue for the Council through provision of a kiosk. No figures are given for what will be raised by this, and the implications of yet another kiosk in this very congested area do not seem to have been fully considered.

**Should this change of use not require a separate planning application?**

### 3. SAFETY/PUBLIC REALM

Residents have raised concerns about the street clutter on Silver Street Bridge, including the existing kiosks, several times in the past and been assured that this would all be fully considered with the review of the toilets, 'The City Council's Urban Design and Conservation Panel are considering the public lavatory provision on the bridge. As part of their assessment of this, they will consider the impact of the street traders who operate from this location'.

Dan Ritchie March 2017.

This holistic appraisal has not happened, and it seems these plans have been developed in isolation without consideration of the wider context and the impact of adding yet another kiosk to an already congested area. It seems even more remarkable that these plans are being rushed through immediately before approval of the Council's SPD on 'Making Space for People', which should greatly influence planning and public realm in this key gateway to the city.

Darwin College's response to the planning application raised safety concerns about congestion in this area and the danger of moving the build line of the new design forward rather than further back to give more space on the footpath.

Students from Queen's College made the same points at the DCF, and cited the advice of the College's Disability officer that the crossing and this area opposite the College should be avoided because it is not safe.

#### **4. SUSTAINABILITY AND BIODIVERSITY**

There are very serious concerns about water in this region. Public toilets catering for thousands of visitors use a very large amount, and residents are asking, 'Why are these toilets not using the most up-to date technology to ensure they conserve as much water as possible?' People were shocked at the DCF to hear the architect admit that the water collected from the tank on the roof would be less than 0.5 of that needed, and that the tower was not functional but, 'gestural' - his word. How can this be acceptable when the river Cam is dying due to over-abstraction?

It is the height of this gestural tower that also necessitates maintaining the adjacent willow tree in a pollarded condition, leading to a 'managed decline'. This tree is not just beautiful, it is home to many different kinds of wildlife, and vital for biodiversity - we should be valuing mature trees rather than harming them for a design that is not fit for purpose.

The Committee report claims that, 'The proposal will result in a net biodiversity gain through the provision of a bat box and insect hotel'.

This is clearly just misleading and wrong.

Since these plans were made early in 2017 the Council has declared climate and biodiversity emergencies - if this design is now nodded through by the planning committee it will be clear that this is just lip service. Residents expect deeds not just words from councillors, and that the urgent need to address climate change will require radical action, and a rethink even on pet projects such as this one.

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