

For office use only
Agent number:
Representor number:
Representation number:



Draft North East Cambridge Area Action Plan Consultation 2020

Response Form

How to use this form

If you are able to, please comment online at www.greatercambridgeplanning.org/nec. You can comment on part or all of the Draft Area Action Plan online, and your response can be analysed more quickly and efficiently if you do so.

If you wish to comment using this form, please note we will transcribe all your responses into our online consultation system, and they will be published as part of our consultation feedback.

There are three parts to this form. Please fill in the form electronically or in black ink.

All comments must be received by **5pm on Monday 5 October 2020**. Thank you for taking the time to respond to this consultation.

Part A – Your details

- We ask for your name and postal address because the Councils must comply with national regulations for plan-making. We also ask for contact details but it is optional for you to give these. Please be aware that if you do not provide contact details and 'opt-in' to future notifications, we will not be able to notify you of the future stages of the North East Cambridge Area Action Plan.
- Your name will be published alongside your representations on our website, but your email address, address and phone numbers will not.

Part B - Response to the ten big questions

- This section asks you to answer ten important questions about the Area Action Plan. You can answer some or all.
- Each question has a multiple choice answer and the opportunity to add further comments.

Part C – Comments on specific policies and supporting documents

- You can comment on specific policies in the draft Area Action Plan, and on the draft Sustainability Appraisal, draft Habitats Regulations Assessment and draft Policies Map.
- Please copy this part of the form as many times as you require. You should complete a separate response for each policy or supporting document you wish to comment on.

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or nec@greatercambridgeplanning.org

Part A – Your Details

Please note that we cannot formally register your comments without your name and postal address, because the Councils must comply with national regulations for plan-making.

We also ask for contact details but it is optional for you to give these.

If you do not provide contact details and 'opt-in', we will not be able to notify you of the future stages of the North East Cambridge Area Action Plan.

Name:	Suzie Wood	Agent's name: (if applicable)	Garth Hanlon
Name of organisation: (if applicable)	St John's College	Name of Agent's organisation: (if applicable)	Savills
Address:	The Bursary St John's Street Cambridge	Agent's Address:	Unex House 132-134 Hills Road Cambridge
Postcode:	CB2 1TP	Postcode:	CB2 8PA
Email (optional):		Email (optional):	
Telephone (optional):		Telephone (optional):	

Signature:	Date: 2 nd October 2020
If you are submitting the form electronically, no signature is required.	

Data Protection

We will treat your data in accordance with our [Privacy Notice](#). Information will be used by South Cambridgeshire District Council and Cambridge City Council solely in relation to the North East Cambridge Area Action Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Comments, including your name, are published on our website, but we do not publish your address or contact details.

By submitting this response form you are agreeing to these conditions.

The Councils are not allowed to automatically notify you of future consultations unless you 'opt-in'. Do you wish to be kept informed about future planning consultations run by the Greater Cambridge Planning Service on behalf of Cambridge City Council and South Cambridgeshire District Council?

Please tick: Yes No

Part B – Response to the ten big questions

1. What do you think about our vision for North East Cambridge?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Further comments:

The vision for an inclusive, walkable, low-carbon new city district with a lively mix of homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods is sensible but not specific to NEC. The Science and Innovation Parks need to be able to evolve in order to build upon their world-renowned reputations.

“The protection, intensification and diversification of business and industrial floorspace within the existing employment areas” as a Core Element of the Framework is welcomed.

The changes to the Use Classes Order whereby previous Business and Retail Uses (and others) are part of a broader Commercial, Business and Service Use Class will require a review of the AAP. Exceptional circumstances will need to be demonstrated to limit any future planning permission to a specific use(s) within that Use Class. It is accepted that the contributions the Science and Innovation Parks make to the national economy could constitute sound planning reasons to limit future permissions to Business Uses, but this also requires them to be able to evolve.

2. Are we creating the right walking and cycling connections to the surrounding areas?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

Safe crossing of Milton Road is important but this does not necessarily need to be two new crossings (one likely to be an underpass and one likely to be a bridge) plus an improved junction where Milton Road meets the guided busway as indicated on the plan on page 14.

3. Are the new 'centres' in the right place and do they include the right mix of activity?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

The social and cultural hubs should be geographically spread as proposed. Their precise location should not be prescribed. The plan on page 15 should be treated as indicative - a local centre near St John's Innovation Park is welcomed. This is a more general point in that the Plan is currently unduly prescriptive – see further examples below.

4. Do we have the right balance between new jobs and new homes?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

The broad geographic location of business space and new homes shown on the plan on page 16 is appropriate. The reference in the supporting paragraphs to job numbers (20,000 new jobs) should not be treated as a ceiling. Further consideration to the development capacity of parcels will be required following receipt of the responses to this consultation including the comments on policy 12a and 8.9 Trajectories below.

5. Are we are planning for the right community facilities?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not

Not at all

Further comments:

The proposed provision of social and cultural facilities for workers as well as residents is welcomed.

6. Do you think that our approach to distributing building heights and densities is appropriate for the location?

Yes, completely

Mostly yes

Neutral

Mostly not

Not at all

Further comments:

An approach where storey heights are generally greatest towards the centre of the area is sensible, but landmark buildings in key locations should not be discouraged.

Commercial buildings in particular will often have a storey height of more than 3m, whereas the maximum storey heights are expressed as multiples of 3m.

The LCVIA on which the AAP is seemingly based did not consider some taller buildings within areas and also only considered 3 scenarios – the majority of buildings being up to 6 storeys, 9 storeys and 12 storeys. A more nuanced assessment would support some taller buildings on parts of the site. The LVA submitted as part of applications 20/03523/FUL (South Cambs) and 20/03524/FUL (Cambridge City) for example demonstrates that some buildings taller than the maximum heights in metres shown on the plan on page 18 can be satisfactorily accommodated on the site in terms of landscape and townscape effects. It may be the intention that some taller buildings are appropriate where justified by the inclusion of “Localised increases in height should be located to help define key centres of activity within the area and help with wayfinding” in Policy 9, but reference to the maximum heights in the Policy makes this unclear.

It should be noted that during the pre-application discussions with officers concerning the above two applications on land in the north west part of the Innovation Park, emphasis was placed upon the importance of a landmark building at this entrance to the City.

7. Are we planning for the right mix of public open spaces?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

Open spaces are important parts of places. Green spaces that are not open to the general public but provide open space for users (e.g. workers) of a site can also make an important contribution to health and well-being.

8. Are we doing enough to improve biodiversity in and around North East Cambridge?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

Developments should achieve the national recognised standard of net gain, and if they can achieve this on site, there should not be a requirement to make contributions towards off-site improvements. At the time of writing the Environment Bill has not been made law.

9. Are we doing enough to discourage car travel into this area?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

It is important that sustainable, active travel is encouraged and vehicle traffic is managed. The area should be designed to make walking and cycling the easy and natural choice. It will also be important to be “more efficient about how car parking is allocated” as proposed and limit the amount of parking that is built for new homes. More work is required on this, and as included in the comments on Policy 22 below, there should not be a blanket requirement for each land parcel to reduce its existing car parking allocation / occupancy.

10. Are we maximising the role that development at North East Cambridge has to play in responding to the climate crisis?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

The AAP should not be over-prescriptive e.g. by stating that all new non-residential flat roofs will have green or brown roofs for biodiversity. Instead, developers should have flexibility to meet standards.

The recognition that BREEAM ‘Outstanding’ should be an ambition but that ‘Excellent’ or equivalent is the requirement is welcomed.

Part C – Comments on specific policies and supporting documents

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 1 - A comprehensive approach at North East Cambridge
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:

Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.

Please copy this page for each policy or part of the document you are responding to.

The sentence starting “The Councils will work to secure...” should be revised to more clearly state that the 20,000 new jobs are a minimum. The “at least” in this sentence applies to the 8,000 new homes, needs to apply to the 20,000 new jobs and does not apply to the new infrastructure.

Any ‘active management’ of the phasing of homes, jobs and infrastructure must not delay the delivery of jobs.

The reference to maximising job opportunities for local people is well-intentioned and supported in principle, but the mechanisms by which it is intended to achieve this need to be clear.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 2 - Designing for the climate emergency
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p>
<p>Clarification as to the type and scale of development that Policy 2 applies to, including for example the requirement to undertake overheating analysis, needs to be provided.</p> <p>The requirement to “minimise” carbon emissions is ambiguous and unduly onerous in that it is not qualified. It is noted that further work to inform the development of a carbon reduction target is currently being undertaken, and will inform specific targets. The acknowledgement that the requirements will be viability tested is welcomed. These targets will clearly need to be consulted upon.</p> <p>Requirements are, as the AAP itself states, robust and many/most known technologies will need to be employed to meet the prescribed standards. Futureproofing is important for all but it is unclear how it is expected that applicants meet the requirement to demonstrate that proposals are futureproofed to enable future occupiers to easily retrofit additional technologies.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 3 - Energy and associated infrastructure
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
 Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.
 Please copy this page for each policy or part of the document you are responding to.

The investigation of an Area Action Plan wide approach to energy and associated infrastructure is welcomed but as the policy acknowledges, this needs to be where feasible and viable, and must also not delay the delivery of development.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 4a Water efficiency, and 4b Water quality and ensuring supply and Policy 4c: Flood Risk and Sustainable Drainage
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p> <p>The draft policy states that “Proposals for non-residential development must achieve 5 BREEAM credits for water use (Wat 01), unless it can be demonstrated that such provision is not technically or economically viable”.</p> <p>Current applications 20/03523/FUL (South Cambs) and 20/03524/FUL (Cambridge City) for Phase 1 at the St John’s Innovation Park will achieve 4 of the 5. The reason that 5 credits are not being targeted at this stage is due to the limitations of roof area available for rainwater harvesting on building 1 plus the additional sanitaryware fittings that would be included in the transport hub. As such the required flow rates to achieve a 55% reduction could be prohibitive from a performance perspective”.</p> <p>It is agreed that a more ambitious target than the existing Local Plan target of 2 of the 5 should be included, but to enable balancing of different considerations, 4 out of 5 should be the minimum.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 5: Biodiversity and Net Gain
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p> <p>The proposal to require the national recognised standard of net gain as a minimum rather than a higher requirement is supported. The supporting text, which states that the policy has been prepared to ensure that an appropriate balance can be achieved between meeting national biodiversity requirements, working towards the Councils' commitments in tackling biodiversity and ecological emergencies and the challenges of exceeding this within a higher density context is endorsed. The proposed mitigation hierarchy – on-site, then adjacent to NEC and then across the city and further afield – is also logical.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 6a: Distinctive design for North East Cambridge and Policy 6b: Design of mixed-use buildings
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p> <p>The expectation that development in North East Cambridge will provide distinctive, high-quality and contemporary design and architecture that respond to and positively contribute to Cambridge's heritage and townscape qualities is endorsed.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 7: Legible streets and spaces
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p> <p>The requirement for all development proposals within North East Cambridge to contribute towards the creation of high quality, inclusive, compact, connected and attractive streets and spaces, and the focus on trees and landscaping within the policy, is supported.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 8: Open spaces for recreation and sport
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p> <p>As Policy 8 makes clear, new and enhanced open space and recreation sites/facilities are a key element of a successful place, including by meeting the health and wellbeing needs of existing and future users of the area. The policy requires all open spaces to be publicly accessible, but it needs to be recognised that open spaces within commercial developments may not be overtly public but are still important in playing a key role in promoting health and wellbeing, as well as creating attractive places.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 9: Density, heights, scale and massing
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p>
<p>The expectation in the policy that the overall approach to building densities, heights, scale and massing for all development proposals at North East Cambridge will create a well-articulated and varied skyline throughout the area is roundly supported. It is also agreed that the impact of new development on the historic and wider skyline and their relationships with the surrounding context, the setting of Cambridge and Fen Edge approaches should be carefully assessed and considered through appropriate landscape and visual impact assessment, heritage impact assessment and massing studies.</p> <p>An approach where storey heights are generally greatest towards the centre of the area is sensible also, but landmark buildings in other key locations should not be discouraged (provided site specific assessments demonstrate that they can be satisfactorily accommodated on the site in terms of landscape and townscape effects). The LCVIA which seemingly informed the AAP did not consider some taller buildings within areas and also only considered 3 scenarios – the majority of buildings being up to 6 storeys/18 metres, 9 storeys/27 metres and 12 storeys/36 metres i.e. incremental increases of 3 storeys/9 metres each. None of the scenarios considered buildings above 6 storeys/18 metres towards the northern extent of the area. A more nuanced assessment would support some taller buildings on parts of the site. The LVA submitted as part of applications 20/03523/FUL (South Cambs) and 20/03524/FUL (Cambridge City) for example demonstrates that some buildings taller than the maximum heights in metres shown on the plan on pages 18 and 103 can be satisfactorily accommodated on the site in terms of landscape and townscape effects. It may be the intention that some taller buildings are appropriate where justified by the inclusion of “Localised increases in height should be located to help define key centres of activity within the area and help with wayfinding” in Policy 9, but reference to the maximum heights in the Policy makes this unclear.</p>

In addition to its content, the presentation of Policy 9 should also be reviewed. This is an example of where plans are currently too prescriptive, and a 'heatwave' approach would be more appropriate. The supporting text also states that Figure 21 is based on an assumed floor to floor height for residential use of 3m. Commercial buildings in particular will often though have a storey height of more than 3m. As currently presented this gives rise to the potential for ambiguity. Referring back to applications 20/03523/FUL (South Cambs) and 20/03524/FUL (Cambridge City), one of the proposed buildings is 5-storeys and 23.3 metres high. This highlights an ambiguity with Figure 21 as currently presented in that it is not higher than the 4-5 storeys typical height – there is no reference to 3m storeys in the policy – but is higher than the 18 metres maximum height.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 10a: North East Cambridge Centres, 10b: District Centre, 10c: Science Park Local Centre and Policy 10d: Station Approach and 10e: Cowley Road Neighbourhood Centre
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>The broad rationale for the distribution of centres is understood. The Cowley Road Neighbourhood Centre (Policy 10e) is indicated to be partly on land owned by St John's College. Whilst there are longer term plans for the redevelopment of parts of St John's Innovation Park, further clarification and discussion is required as to how it is anticipated that the "small amount of ancillary retail space would extend the local centre over Cowley Road" into St John's Innovation Park would be accommodated in advance of any redevelopment.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 11 Housing design standards
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>No specific comments.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 12a: Business, 12b: Industry, storage and distribution
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:

Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.

Please copy this page for each policy or part of the document you are responding to.

It is agreed that there is space to intensify existing business parks. The support in Policy 12a for the redevelopment of St John's Innovation Park to support existing and future business needs (including the redevelopment of existing under-utilised premises, including associated car parks, and the introduction of other supporting uses) is also supported.

Policy 12a references up to 234,500m² net additional B1 floorspace, including up to 35,000m² on the St John's Innovation Park. Capacity analysis previously provided to the Councils and included as part of applications 20/03523/FUL (South Cambs) and 20/03524/FUL (Cambridge City) demonstrates that some 50,000m² of additional commercial floorspace can be satisfactorily accommodated on the Park. The capacities in the AAP need to be reassessed. The acknowledgement that "Proposals which exceed these figures will need to be justified in terms of the impact on the trip budget and Area Action Plan wide infrastructure and where the character, role and function of an area will not be compromised" is welcomed and should also be retained in the final version as an acknowledgement that the floorspace figures should not be treated as a ceiling.

Further clarification of the requirement in Policy 12b to provide 10% of the new floorspace as affordable industrial workspace, subject to scheme viability, is required particularly as to what constitutes affordable workspace. It is not appropriate to leave it to the Council's Economic Development Team to work with developers to agree appropriate terms of affordability on a case by case basis as proposed.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICIES 13a: Housing, 13b: Affordable housing, 13c: Build to Rent, 13d: Housing for local workers, 13e: Custom Build, 13f: Short term/corporate lets and visitor accommodation
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>The expectation in Policy 13d that developments including affordable private rent as part of their affordable housing allocation demonstrate how these homes will be targeted to meet local worker need is welcomed.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 14: Social, community and cultural Infrastructure
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>The acknowledgement that “Ancillary uses for sports or leisure facilities provided within an employment development will be supported, subject to any relevant amenity issues being addressed....” is welcome. The requirement to explore the opportunity to offer these spaces to other users within and outside of normal working hours, rather than any requirement that they be offered, is also welcomed.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 15: Shops and local services
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>As commented upon in response to Policy 10e, the Cowley Road Neighbourhood Centre is indicated to be partly on land owned by St John's College. Whilst there are longer term plans for the redevelopment of parts of St John's Innovation Park, further clarification and discussion is required as to how it is anticipated that the "small amount of ancillary retail space would extend the local centre over Cowley Road" into St John's Innovation Park would be accommodated in advance of any redevelopment.</p> <p>This section in particular will also need to be reviewed in light of the changes to the Use Classes Order.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICIES 16: Sustainable Connectivity and 17: Connecting to the wider network
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
 Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.
 Please copy this page for each policy or part of the document you are responding to.

Safe crossing of Milton Road is important but this does not necessarily need to be a new bridge as referenced in Policy 16 and shown on Figure 36, or the two new crossings (one likely to be an underpass and one likely to be a bridge) plus an improved junction where Milton Road meets the guided busway as indicated on the plan on page 14 and Figure 37 on page 190. Further work should inform the most appropriate solution(s).

Improved connections to the wider network, and specifically improvements to the links to and from the existing Jane Coston Bridge over the A14 to reduce the current conflicts with motor vehicles, are supported.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 18: Cycle Parking
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>The proposal not to specify minimum levels of cycle parking to be provided to allow for site-specific solutions is supported. The range of cycles has increased, and it is agreed that a percentage of parking should be suitable for larger cycles, but it is considered that the policy should require this to be justified in each instance rather than setting a minimum percentage in the policy.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 19: Safeguarding for Cambridge Autonomous Metro and Public Transport
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:

Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.

Please copy this page for each policy or part of the document you are responding to.

The principle of safeguarding land for the CAM is sensible but it is questioned whether a development plan policy can specifically safeguard what is acknowledged as being only an indicative area. The Consultation Draft itself acknowledges that more certainty will be given as the plan process advances.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 20: Last mile deliveries
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.
Please copy this page for each policy or part of the document you are responding to.

No specific comments.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 21: Street hierarchy
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>The street hierarchy set out in the Policy and in Figure 40 is logical, and the principle of car barns is supported. They should be located “where they are accessible to residents and workers” as proposed and it should be made clear the locations shown on Figure 40 are indicative.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 22: Managing motorised vehicles
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:

Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.

Please copy this page for each policy or part of the document you are responding to.

It is accepted that motorised vehicular trips will need to be managed, and sustainable travel options enhanced. Whilst the Plan could and indeed should encourage developers to work together to agree a site-wide Transport Assessment and Travel Plan with the local highway authority as proposed, the local authorities have a key role in this regard, and development should not be dependent on just all developers working together.

The importance of limiting vehicular trips generated by new development is understood and the College remains committed to developing sustainable transport measures. Whilst planning for a three-fold increase in the amount of commercial floor space on the Innovation Park, no increase in car parking provision is planned on the Park. Car parking across the area, and beyond, should be assessed in light of further development parcel capacity work across the area in response to the responses to this consultation. There should not be a blanket requirement for each land parcel to reduce its existing car parking allocation / occupancy.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 23: Comprehensive and Coordinated Development
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>It is important, as required by the Local Plans, that planning applications submitted before the adoption of the AAP can be considered on their own merits and subject to ensuring that they would not prejudice the outcome of the AAP process and the achievement of the comprehensive vision for the area as a whole that will be established by the AAP. This is important to ensure that the benefits of development that would not prejudice the outcome can be delivered without delay.</p> <p>The requirement for a masterplan to support applications is understood, but the policy as currently worded does not make it clear what area a masterplan is expected to cover.</p> <p>c. i. as currently worded requires proposals to be landscape-led with respect to layout and access. Landscape is a key component in creating great places and should be a key driver in determining layout and access, but layout and access should not necessarily be landscape-led.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICIES 24a: Land Assembly and 24b: Relocation
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>Positive intervention, in the form of land assembly and the relocation of existing floorspace and uses (and thereby existing businesses), is to be welcomed.</p> <p>Policy 24a simply reiterates the steps and tests required in order to use compulsory purchase.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 25: Environmental Protection
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>The requirement to fully consider all environmental impacts to ensure that the future health, quality of life, amenity and the natural environment is supported.</p> <p>Pre-application discussions with the Greater Cambridge Shared Planning Service to determine the individual submission requirements for impact assessments as stated should not be required. Guidance should clearly set this out.</p> <p>There are concerns that the Cambridge City Council's Technical note of the interpretation of Planning Applications in the vicinity of Cambridge Water Recycling Centre (October 2018) carried out by Odournet is not a robust evidence base on which to make decisions – see the Assessment of the impact of odour from Cambridge Water Recycling Centre on St John's Innovation Park Masterplan Phase 1 submitted as part of applications 20/03523/FUL and 20/03524/FUL.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 26: Aggregates and waste sites
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>As with land assembly and the relocation of existing floorspace and uses (policies 24a and 24b), the Councils' commitment to positive intervention, in this instance in the form of work with the Minerals and Waste Authority and relevant landowners in securing a suitable off-site relocation for the Veolia Waste Recycling Transfer Station within the Cowley Road Industrial Estate, is welcome.</p> <p>Use classes will need to reviewed in light of the recent changes including the reference to light industrial in the policy (which was B1c and is now E(g)(iii)) which is stated to be B2 in the policy. The supporting text correctly refers to General Industrial (B2) rather than light industrial.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 27: Planning Contributions
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
 Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.
 Please copy this page for each policy or part of the document you are responding to.

The requirement for developments to mitigate site specific impacts made necessary by the proposal is recognised. The requirement to “finance the early delivery of major strategic infrastructure as identified in the Infrastructure Delivery Plan established up-front by the Councils” needs to be carefully considered and justified. Further engagement with stakeholders when further details are available on this would be expected, and certainly well in advance of a Regulation 19 version of the Plan. Development viability will need to be a key consideration.

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 28: Meanwhile uses
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>A policy providing support for meanwhile uses is supported.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 29: Employment and Training
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>St John's College are committed to promoting development that makes provision for a mix of meaningful employment opportunities in order to support local residents, students, apprentices and the Greater Cambridge economy.</p> <p>The ambition set out in the Draft AAP to increase opportunities for training and employment by developers contributing to a range of employment, skills and training initiatives is also supported in principle. It is not clear though in the current draft how "access to new job opportunities, including an agreed target, created during the construction stage of development, will be secured through a Section 106 agreement" particularly in terms of how targets will be fairly and reasonably related in scale and kind to the development.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	POLICY 30: Digital infrastructure and open innovation
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please <u>copy this page</u> for each policy or part of the document you are responding to.</p> <p>North East Cambridge should be at the centre of new digital infrastructure and open innovation.</p> <p>As set out in the 'What you told us previously', it is important that the Area Action Plan allows for innovative solutions as technological advances come forward, rather than being absolute and inadvertently restrictive.</p>

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	8.9 Trajectories
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:

Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.

Please copy this page for each policy or part of the document you are responding to.

8.9.2 provides a summary of the broad distribution of the office development (B1) provision set out in the plan and makes clear that, at this stage, the Councils are not advocating this programme but are inviting comment on the assumptions set out.

For St John's Innovation Park, the summary includes:

9,080sqm in 2020-25;

7,160sqm in 2025-30;

9,380sqm in 2030-35;

9,380sqm in 2035-40 (and thereby a total of 35,000 in the Plan Period 2020-2040); and

4,700sqm in 2040+ (and thereby a total of 39,700).

Comments in relation to this summary:

- It should refer to business use (B1) (now Class E(g)) not just office development;
- The capacity analysis previously provided to the Councils and included as part of applications 20/03523/FUL (South Cambs) and 20/03524/FUL (Cambridge City) demonstrates that some 50,000m² of additional commercial floorspace can be satisfactorily accommodated on the Park;
- The proposed development submitted under 20/03523/FUL (South Cambs) and 20/03524/FUL (Cambridge City) amounts to some 17,000sqm of additional commercial floorspace and is envisaged to be provided in the period 2020-2025;
- The capacity analysis provided to the Councils as part of these applications includes a phasing plan which anticipates all of the c.50,000m² of additional floorspace being provided by 2042; and
- The anticipated delivery programme in 2020-2025 and even the earlier years of 2025-2030 emphasise the importance of comments made in relation to Policy 23, namely

that it is important that planning applications submitted before the adoption of the AAP can be considered on their own merits and subject to ensuring that they would not prejudice the outcome of the AAP process and the achievement of the comprehensive vision for the area as a whole that will be established by the AAP.

Completed response forms must be received **by 5pm on Monday 5 October 2020**. These can be sent to us either by:

Email: nec@greatercambridgeplanning.org or post, to:

Greater Cambridge Shared Planning
Cambridge City Council
PO Box 700
Cambridge CB1 0JH