

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:	Agent's name: (if applicable)	Joel Jessup	
Name of organisation: (if applicable)	Tarmac Trading Limited	Name of Agent's organisation: (if applicable)	Heatons
Address:	C/O Agent	Agent's Address:	9 The Square, Keyworth, Nottinghamshire
Postcode:		Postcode:	NG12 5JT
Email (optional):		Email (optional):	████████████████████
Telephone (optional):		Telephone (optional):	████████████████

Signature:	Date:	05/10/20
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:

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:

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:

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:

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

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

Further comments:

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:

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

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

Further comments:

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:

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

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

Further comments:

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:

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)	<ul style="list-style-type: none"> • 1.7 'Open Spaces' • 3 'A Spatial Framework for North East Cambridge' • 6 'Jobs, Homes and Services', particularly: <ul style="list-style-type: none"> ○ Policy 12a 'Business'; and ○ Policy 12b 'Industry, Storage and Distribution' • 8.3 'Environmental Protection', particularly: <ul style="list-style-type: none"> ○ Policy 25 'Environmental Protection'; • 8.4 'Aggregates and waste sites', particularly: <ul style="list-style-type: none"> ○ 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:

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.

General Comments on the AAP, specifically Section 1.7 'Open Spaces', Section 3 'A Spatial Framework for North East Cambridge', and Section 6 'Jobs, Homes and Services':

These comments are submitted on behalf of our client, Tarmac, who operate a rail fed asphalt plant, an aggregate handling depot, and readymix concrete plant within the Area Action Plan (AAP) for North East Cambridge (NEC). The sidings, plant, and depot are located as shown on the *Proposed land uses within the AAP boundary* (Figure 11) labelled 'aggregate railheads'. Our client's operations take place on land within Network Rail freehold ownership but are well-established and benefit from planning consent as well as policy support for their safeguarding within the Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals DPD (Policy SS P T2).

Our client has previously submitted comments to the Issues and Options stage of the AAP's development in March 2019, whereby it was emphasised that "the site is vital to enabling the sustainable transport of minerals which will be required to deliver the development of infrastructure in Cambridge and the surrounding areas. It is important that the rail fed asphalt plant and aggregates depot is safeguarded and appropriate development is proposed in the area surrounding it."

At this stage, we would like to re-emphasise the above and support the inclusion of Policy 25 'Environmental Protection' and Policy 26 'Aggregates and waste sites', particularly in light of the new 'Proposed land uses' shown on Figure 11 of the latest version of the AAP. Figure 11 shows the retention of the aggregates railhead with what appear to be a potentially more appropriate mix of land uses surrounding the site (labelled as Industrial (B2), storage and distribution (B8), and a Linear Park as shown at Section 1.7), at least when compared with the Issues and Options version of the AAP.

The objectives contained within Policy 26 to safeguard the existing mineral operations in accordance with the area's Development Plan and paragraphs 182 (detailed below) and 204(e) of the NPPF to ensure the safeguarding of the mineral transportation and handling operations are supported.

Whilst we welcome the introduction of Policies 25 and 26 as well as a buffer/screen between the existing mineral operations and potential sensitive receptors such as residential properties, the AAP should ensure that proposed buffer/screens are sufficiently robust and provide adequate protection for potential future residential occupiers given the potential for unintended adverse impacts, or nuisance impacts, that could emanate from the mineral operations. In accordance with the 'agent of change' principle contained within NPPF at paragraph 182, existing businesses and facilities should not have unreasonable restrictions placed upon them as a result of development permitted after they were established. The onus to protect or 'provide suitable mitigation' for future residential amenity is on newly-introduced land uses rather than established / consented land uses and operations. We support the specific direction within Policy 26 that accords with the need to safeguard mineral activities in accordance with NPPF paragraph 204(e) that states that "any residential proposal ... will need to demonstrate how it achieves acceptable environmental standards (i.e. buffering) from the negative impacts of the aggregate railheads."

Having regard to the above, consideration should be given to the appropriateness of the 'Linear Park' shown at Section 1.7 to provide effective amenity screening of the existing mineral operations (specifically to mitigate visual and noise impact). Figure 11 of the latest iteration of the AAP still shows 'housing-led' land uses north of the aggregate railhead, depot, and readymix plant in close proximity with only a narrow Linear Park shown (at section 1.7) between mineral operations and housing-led development. If the AAP proposes to introduce buffer / screening land use between sensitive uses and established mineral operations, the content of the AAP should consider that practically, the successful implementation and effectiveness of buffer / screening land use is reliant on assessment of the effectiveness of any screen, and subject to the findings of that assessment, the buffer / screen being delivered prior to the introduction of sensitive land uses.

As well as questioning how effective the narrow Linear Park would be in protecting the amenity of nearby sensitive receptors, we would also like to emphasise that phasing of development will be critical to ensuring that existing mineral operations can continue without adverse impact on new residential or similarly sensitive land uses. It is important to protect amenity by ensuring that sufficient and robust buffers / screening uses are in place prior to the introduction of new sensitive receptors close to the existing mineral operations. The AAP should be prescriptive in requiring technical assessment(s) (such as noise and air quality assessments) alongside proposals for sensitive land uses to ensure no unacceptable disamenity impacts on new development will occur from the existing mineral operations. We support a requirement for new development proposals to be accompanied by "effective mitigation and remediation plans ... to consider individual and cumulative impacts, timing and phasing, and current and future uses" as outlined in Policy 25.

Regarding the wider spatial distribution of housing within NEC, the AAP should recognise that whilst the 'Chesterton Sidings' parcel of NEC may be the most sustainable location for new housing given its proximity to Cambridge North Station, the sidings are the only possible location for the existing rail-fed mineral operations and they should be safeguarded in accordance with NPPF paragraph 204(e). By contrast, there remains flexibility over where to locate residential and similar sensitive uses within NEC. At present, Policy 26 states that redevelopment of the railheads "will only be acceptable if the current operation is relocated off-site". We submit that the railheads and associated mineral operations remain a strategic site for mineral transport and an important site for mineral processing. It is the intention of Tarmac to continue to operate the site throughout the AAP plan-period to 2040 unless, in line with the intentions of Policy 26, a suitable alternative site was identified and adequate commercial terms were presented. In such a circumstance, Tarmac would consider the relocation of these strategic operations.

Until any possible future relocation of the mineral operations is agreed, the railhead, depot and readymix plant should be safeguarded and great weight given to the protection of their strategically important operations within the AAP.

Finally, Policy 12a 'Business' and Policy 12b 'Industry, Storage and Distribution' propose the delivery of up to 36,500m² of additional B1 floorspace and a minimum of 8,500m² of B2/B8 floorspace within the Chesterton Sidings area of NEC. We submit that the existing mineral operations should not be directly or indirectly detrimentally impacted upon by the introduction of a significant volume of new development. Whilst Policy 26 aims to protect residential development from disamenity associated with the existing mineral operations, the potential for commercial operations to similarly impacted are not considered. Potentially sensitive non-residential land uses should likewise be proposed for locations whereby disamenity associated with mineral operations at Chesterton Sidings are not considered a nuisance due to sufficient separation distance, or can be demonstrated through technical assessment.

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