

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: Peter McKeown (if applicable)	
Name of organisation (if applicable)	Veolia and Turnstone Estates	Name of Agent's organisation: (if applicable) Carter Jonas LLP
Address: c/o Agent	Agent's Address: One Station Square, Cambridge	
Postcode:	Postcode: CB1 2GA	
Email (optional):	Email (optional): [REDACTED]	
Telephone (optional):	Telephone (optional): [REDACTED]	

Signature:	Date:
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)	
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.

Introduction

These representations relate to the site occupied by Veolia Waste Recycling Transfer facility off Cowley Road. Veolia has a long leasehold interest in the land. It is anticipated in the North East Cambridge AAP that the land currently occupied by the Veolia Waste Recycling Transfer Site would be redeveloped for business (B1) and housing uses within tall buildings of between 5 to 8 storeys in height, and adjacent to business and town centre uses and housing. However, the plan provided at Figure 11 is not particularly clear and it would appear that important operations such as Veolia have been forgotten about throughout the process to date. The site needs to generate a high use value to make the land viable and to fund the purchase, development and move to another relocation site. Therefore the proposed use of the Veolia site for business (B1) and housing uses are supported.

It is proposed in Policy 26 that the existing Waste Recycling Transfer facility would be relocated off site. As noted in Policy 26, that relocation would be undertaken in collaboration with the Minerals and Waste Authority (Cambridgeshire County Council) and is a pre-requisite of the redevelopment of the site and surrounding area for the proposed uses. It is acknowledged in the supporting text to Policy 26 that the Council will work with the landowner to secure a suitable alternative site for the Waste Recycling Transfer facility. However, it should be noted that funding has been provided to enable the relocation of the Cambridge Waste Water Treatment Works, but no funding is available for the relocation of other services and facilities including the waste recycling transfer facility which is also essential to the delivery of the AAP. The relocation of Veolia's operations to another site needs to be viable and acceptable to the company from an operational perspective.

As set out in these representations, the adopted and emerging Minerals & Waste Local Plans seek to safeguard the existing waste recycling transfer facility operated by Veolia in its current location, and it appears that the policy requirements for a replacement facility might be difficult to achieve on a suitable alternative site. Veolia is an existing established business, and a replacement facility should be located within or close to Cambridge in order to avoid the unnecessary transportation of recycled waste and material.

It is requested that Policy 26 is amended so that the redevelopment of the existing Veolia Waste Recycling Transfer facility site off Cowley Road cannot happen until a suitable alternative site for this facility has been identified and approved.

Policy 1: A comprehensive approach at North East Cambridge

The comprehensive approach towards development and regeneration at North East Cambridge is broadly supported. However, a comprehensive approach must include the following: appropriate phasing of redevelopment sites to ensure that proposed uses are compatible with existing business operations on adjacent sites and in close proximity, including the existing waste recycling transfer facility off Cowley Road; 'meanwhile' uses that are appropriate and compatible with existing business operations on adjacent sites; and, the successful relocation of the existing waste recycling transfer facility to a suitable alternative site within close proximity of Cambridge.

Policy 9: Density, heights, scale and massing

Figure 21 shows building heights for the proposed business space (B1) and housing at the Veolia site off Cowley Road of between 5 to 6 storeys and a maximum of 8 storeys. The proposed uses on the neighbouring areas also include tall buildings.

The proposed uses and the building heights for the Veolia site are supported, and these higher value uses are necessary to enable the existing waste recycling transfer facility to be relocated off site, otherwise relocation would not be viable.

In addition, the phasing of redevelopment will be important in order to ensure that tall buildings are compatible with existing uses e.g. waste recycling transfer facility such like Veolia that might remain in operation if an alternative site is not identified. It is unlikely that effective temporary noise mitigation measures could be provided within the proposed residential buildings to address the noise generated by activities associated with the existing waste recycling transfer facility.

Policy 14: Social, community and cultural infrastructure

The inclusion of additional social, community and cultural facilities within the North East Cambridge area is supported.

Policy 15: Shops and local services

The inclusion of additional shops and local services, including a new district centre, within the North East Cambridge area is supported. However, these uses need to be delivered in locations reflective of the land value generated where that it is necessary to facilitate release of land. Lower value uses should not be proposed on the Veolia site.

Policy 23: Comprehensive and Coordinated Development

Policy 23 seeks to ensure a comprehensive and coordinated approach to development and regeneration at North East Cambridge, which is broadly supported. Policy 23 requires applications for major development to successfully integrate with the surrounding area and to successfully mitigate environmental constraints – see criteria c(ii) and c(vii). It is anticipated that

the land currently occupied by the Veolia waste recycling facility would be redeveloped for business (B1) and housing with the adjacent land redeveloped for business and town centre uses and housing. The proposed buildings on the site would be up to a maximum of 8 storeys, and on the neighbouring land the buildings would be up to a maximum of 13 storeys high. However, it is expected that the existing waste recycling transfer facility would continue to operate for a temporary period or indefinitely if a suitable alternative relocation site is not identified. Therefore, an appropriate phasing of redevelopment sites must be provided to ensure that proposed uses are compatible with existing business operations on adjacent sites and in close proximity, including for the existing waste recycling transfer facility off Cowley Road, in order to avoid potential noise and residential impacts. However, as outlined above the existing Veolia operation will only relocate if they can make the land viable.

Policy 24a: Land Assembly

It is proposed in Policy 26 that the existing waste recycling transfer facility off Cowley Road would be relocated off site, but at this stage no suitable and viable alternative relocation site is identified. Veolia would be affected by the redevelopment of its existing site, and would welcome discussions with the Council to find a suitable alternative viable site from which it can operate a waste recycling transfer facility and release of value from their existing site to facilitate any move.

It would not be necessary or appropriate for compulsory purchase to be used because the Veolia site could be redeveloped in conjunction with Cambridge City Council for the proposed business and housing uses, and designed to meet the policy requirements specified in the AAP.

Policy 24b: Relocation

It is proposed in Policy 26 that the existing waste recycling transfer facility off Cowley Road would be relocated off site, but at this stage no suitable and viable alternative relocation site is identified. Veolia intends to remain operating the waste recycling transfer facility until a suitable and viable alternative relocation site has been identified and approved. It is anticipated in the North East Cambridge AAP that the land currently occupied by Veolia would be redeveloped for business (B1) and housing uses; the retention of the existing waste recycling transfer facility at the existing site is not an option.

Criteria (b) of Policy 24b requires engagement with affected occupiers and tenants where relocation of existing businesses is proposed as part of development at North East Cambridge. Veolia would be affected by the redevelopment of its existing site, and would welcome discussions with the Council to find a suitable alternative site from which it can operate a waste recycling transfer facility. It is disappointing that, given Veolia is a key relocation site (albeit small scale), that they have not been invited to participate in the masterplanning workshops for the wider AAP area that have taken place to date. This engagement with existing land owners and users is an important part of the process and is identified within the Sustainability Appraisal. Given the failure to engage on this site, the legitimacy of the outcomes from these workshops could be challenged. Criteria (c) of Policy 24b sets out a sequential approach to the re-provision of existing uses. Veolia is an existing established business, and a replacement facility should be located within or close to Cambridge in order to avoid the unnecessary transportation of recycling waste and material. As set out in the response to Policy 26, it appears that the policy requirements for a replacement facility might be difficult to achieve on a suitable alternative site without assistance and support from the Council to enable Veolia to relocate its existing operations in a viable manner.

Policy 25: Environmental Protection

Policy 25 seeks to ensure that environmental impacts are considered for development at North East Cambridge, and identifies criteria for development. As set out above, the existing waste recycling transfer facility at the Veolia site off Cowley Road is expected to continue until a suitable and viable alternative relocation site is identified. The operations associated with the waste recycling transfer facility e.g. noise, odours and vehicle movements, could be incompatible with new residential, commercial, town centre and community uses on neighbouring sites without appropriate phasing and the effective relocation of Veolia's operations. Therefore, the criteria in Policy 25 relating to noise and air quality to be assessed as part of design and layout (criteria c), new sensitive uses to be integrated with existing businesses (criteria d), and to avoid unreasonable restrictions on existing business operations (criteria e) are supported.

Policy 26: Aggregates and waste sites

It is stated in Policy 26 that *"the safeguarded Veolia Waste Recycling Transfer Station should be relocated off-site. This would need to be undertaken in collaboration with the Local Minerals and Waste Authority and is a pre-requisite to future sensitive development coming forward on surrounding plots"*. It is anticipated in the AAP that the land currently occupied by the Veolia waste recycling facility would be redeveloped for business and housing uses. However, as explained below, the adopted and emerging Minerals & Waste Local Plans seek to safeguard the existing waste recycling transfer facility in its current location, it appears that the policy requirements for a replacement facility might be difficult to achieve on a suitable alternative site, and at this stage no alternative site for the relocation of Veolia's operations have been identified.

The relevant policies of the adopted and emerging Minerals & Waste Local Plan are identified below, as are the relevant policies of the adopted Cambridge and South Cambridgeshire Local Plans.

The Veolia site is safeguarded as a waste recycling transfer station in the adopted and emerging Minerals & Waste Local Plans, and as such it is anticipated that the existing facility would be retained on site, relocation is not anticipated and no alternative/replacement sites are identified.

Policy CS18: Waste Management Proposals Outside Allocated Areas of the Minerals and Waste Core Strategy Development Plan Document (adopted July 2011) states:

"Proposals for waste management development outside allocated areas will be considered favourably where :-

- *this is consistent with the spatial strategy for waste management, and*
- *it can be demonstrated that they will contribute towards sustainable waste management, moving waste up the waste hierarchy*

Waste recovery and recycling facilities may be permitted where they are:

- a. for on-site management of waste*
- b. on land identified for general industrial use*
- c. co-located with complementary activities (including existing permanent waste management sites)*
- d. on previously developed land*
- e. on farm holdings to facilitate agricultural waste recycling*
- f. within a medical or research institution which is generating waste (bio-medical, research and clinical waste only)*
- g. in strategic development areas*
- h. at inert landfill sites (inert waste recycling only)*

All strategic development will make provision for permanent waste management.”

The existing waste recycling transfer facility operated by Veolia is for general use and is not related to on-site waste management, agricultural waste, medical/research waste, or inert waste. Therefore, criteria (a), (e), (f) or (h) are not relevant in terms of potential alternative sites. It is expected that previously developed land within and on the edge of Cambridge would be redeveloped for higher value uses or the relocation of other commercial activities, and other potentially available land would be subject to constraints including impacts on residential amenity. The employment areas within Cambridge are protected for existing commercial uses or are subject to redevelopment proposals which excluded general industrial type uses. The employment areas in South Cambridgeshire are protected for a limited range of employment uses or are in villages where impacts on residential amenity would restrict a waste recycling use. The strategic development areas on the edge of Cambridge and in South Cambridgeshire are for residential and high value commercial uses where a waste recycling transfer facility is not anticipated or appropriate. Therefore, there are very limited opportunities within or close to Cambridge for a replacement site for a waste recycling transfer facility.

Policy 4: Providing for Waste Management of the emerging Minerals and Waste Local Plan (Proposed Submission Draft November 2019) expects existing waste sites to meet identified needs and so no specific new allocations are proposed. Policy 4 sets out a criteria based policy for new waste facilities, which in summary must be located on sites within the settlement boundary of main settlements and in employment areas identified as suitable for B2/B8 uses or within strategic employment areas. The adopted Cambridge Local Plan 2018 identifies Areas of Major Change but none are suitable for a relocated waste recycling transfer facility, and there are no policies that support this type of use within the settlement boundary. It is likely that any redevelopment opportunities that exist in Cambridge would be brought forward for high value uses e.g. residential and commercial, rather than a waste recycling transfer facility. The South Cambridgeshire Local Plan 2018 does include allocations for B1/B2/B8 uses – at Over and Papworth Everard (see Policy E/5), and Policies E/12 and E/13 support employment uses within and on edge of villages but subject to no adverse impacts, and Policy E/15 identifies established employment areas which mostly accommodate office, research and development, manufacturing and logistics uses. It is likely that the existing employment sites in South Cambridge would not be suitable for a relocated waste recycling transfer facility because they are too far from Cambridge and existing and surrounding uses would be incompatible with such a facility.

The Veolia site is identified as a Waste Management Areas (WMA), and Policy 10 of the emerging Minerals and Waste Local Plan applies. Policy 10 expects such sites to be used for waste management or compatible facilities. Criteria (c) of Policy 10 states: *“proposals which demonstrate clear wider regeneration benefits which outweigh the harm of discontinued operation of the site as a WMA, together with a demonstration to the Waste Planning Authority as to how the existing (or recent) waste stream managed at the site will be (or already is being) accommodated elsewhere”*. Criteria (c) anticipates that if waste management facilities are to be relocated – as is proposed in the North East Cambridge AAP – that there would be a strategy in place to manage the existing waste e.g. recycled waste treated at Veolia’s existing operation. Policy 10 is consistent with the approach advocated in Policy 26 (of the North East Cambridge AAP) that the relocation of the existing waste recycling transfer facility is a pre-requisite of redevelopment of the site currently occupied by Veolia.

Therefore, it is considered that there are very limited opportunities within or close to Cambridge for a replacement site for a waste recycling transfer facility, in that available sites within Cambridge would be redeveloped for high value uses and that existing employment sites within

Cambridge and South Cambridgeshire would not be suitable for such a use. Veolia is an existing established business, and a replacement facility must be located within or close to Cambridge in order to avoid the unnecessary transportation of recycled waste and material. This emphasises the need to maximise the development value of the Veolia site through this process in order to facilitate a relocation to ensure that they can compete with land values and ensure that that any move is financially viable as well as operationally.

As set out in the response to Policy 24b, Veolia would be affected by the redevelopment of its existing site, and would welcome discussions and assistance from the Council to find a suitable alternative site from which it can operate a waste recycling transfer facility.

Policy 27: Planning Contributions

Policy 27 sets out the purpose and approach to planning contributions for development within the North East Cambridge Area. It is acknowledged that the policy contains some flexibility, in that contributions will be assessed on a site by site basis and that viability will be assessed where relevant. It is requested that the level of planning contributions and viability matters should also take into account whether a development is related to the relocation of an existing business or use within the AAP area and enable the delivery of wider aspirations and a coordinated strategy for the area. For example, it is proposed in the AAP that the existing waste recycling transfer facility operated by Veolia will relocate off site. The Veolia site needs to be redeveloped for high value business and housing uses. However, there will be costs associated with the relocation of the waste recycling transfer facility to an alternative site including the purchase of land. The relocation of the waste recycling transfer facility is a prerequisite and essential for the successful redevelopment of this part of the AAP area. It should be noted that HIF funding has been provided to enable the relocation of Cambridge Waste Water Treatment Works, but no public funding is available to support the relocation of Veolia's operations. Therefore, it is requested that any planning contributions and viability considerations for the redevelopment of the Veolia site reflect and take into account the costs associated with the relocation of the waste recycling transfer facility. As outlined within these Representations the value of the Veolia site needs to be maximised to enable a future relocation and therefore the introduction of business (B1) and housing uses are supported. S106 or other associated development costs should be minimised. If the redevelopment of the Veolia site and the associated relocation of the existing waste recycling transfer facility is not viable, then it will either not happen or adjustments will need to be made to the proposed quantum of development or mix and type of uses provided at the site and/or to the level of planning contributions provided.

Policy 28: Meanwhile uses

The grant of temporary consent for 'meanwhile' uses within North East Cambridge is broadly supported. The 'meanwhile' uses could temporarily add to the range of facilities within the area, and could reuse empty or underused land and buildings. It is noted that Policy 28 includes a requirement for 'meanwhile' uses to be subject to relevant amenity issues. As set out above, the existing waste recycling transfer facility at the Veolia site located off Cowley Road is expected to continue until a suitable and viable alternative relocation site is identified. If 'meanwhile' uses occur in the vicinity of the Veolia site in advance of redevelopment it is requested that any temporary uses are compatible with the activities associated with a waste recycling transfer facility on the adjacent site. It is requested that compatibility with neighbouring uses is added to the list of criteria in Policy 28 for the approval of 'meanwhile' uses.

Policy 29: Employment and Training

The employment, skills and training initiatives associated with development within North East Cambridge are supported.

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
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