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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.

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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 C – Comments on specific policies and supporting documents

Document details:	
Which document are you commenting on? (please tick)	<input type="checkbox"/> Draft North East Cambridge Area Action Plan <input checked="" 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)	General comment on overall approach to SA and SEA in defining the project/implementation of the plan
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

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

Chapter 4 of the Sustainability Appraisal (SA) considers the reasonable alternatives for the project and at paragraph 4.3 acknowledges that all options necessitate the relocation of the wastewater treatment works (WwTW) and the AAP has been prepared with the assumption that the WwTW will be relocated.

The Environmental (Assessment of Plans and Programmes) Regulations 2004 make clear that a Strategic Environmental Assessment (SEA) should identify, describe and evaluate the likely significant effects on the environment in respect of implementing the plan and all reasonable alternatives. The site of relocation for the WwTW is yet to be determined and the SA/SEA defers assessment of its environmental effects to the Development Consent Order (DCO) process. However, we would question the robustness of this approach given the relocation of the WwTW forms an intrinsic part of the current development proposals for North East Cambridge (NEC) and therefore implementing the plan in its current form. The Draft NECAAP cannot be implemented as currently proposed without the relocation of the WwTW and all options presented in the SA/SEA require its relocation; hence, the environmental effects of the relocation should be assessed.

There was previously a scenario which included an on-site 'bio-bubble' as part of the NEC development, as an alternative to finding an off-site relocation site for the WwTW. However, we cannot find any evidence of this scenario being assessed in the SA, or a clear rationale for why this option has now been discounted. We also note that Anglian Water is recently quoted as stating that the "relocation project is not an operational necessity" (<https://www.cambridge-news.co.uk/news/cambridge-news/moving-sewage-plant-could-devastating-18842331>). We are of the view that the on-site reconfiguration and upgrading of the WwTW is a reasonable alternative (on the basis that it is considered that this could attain the Councils' policy objectives) which should

therefore be assessed through the SA/SEA process and in any event rationale should be given for why this previously considered alternative has apparently been discounted.

The issue of the WwTW assessment was raised within the Environment Agency's response to the consultation on the Interim SA for the NECAAP Issues and Options (2019), where it gave the following advice:

“This [the WwTW] is most likely to be the biggest direct and indirect water impact of all, and is a highly significant impact in any event, pre-mitigation. Our advice is very clearly that the impact of relocation is potentially highly significant, and that it falls to be appraised as an impact arising from the plan. It also features cumulative effects with other projects, such as Waterbeach New Town, The SEA/SA should address this.”

In response to this, the current draft SA/SEA says that relocation options will be considered through the DCO process and that the SA covers the context of the WwTW's relocation and the mechanism by which the effects of the relocation will be assessed.

At the most basic level, Regulation 12 of the 2004 Regulations require the SEA to consider the likely significant effects on the environment resulting from the implementation of the plan or project. The implementation of the current draft NECAAP necessarily involves, at some stage, the relocation of the WwTW, as it actively plans to develop land on which it is currently located rather than considering any option to develop around a reconfigured WwTW site. We note a difference in approach to the relocation of the WwTW when compared with the off-site relocation of the Veolia Waste Transfer Station. At paragraph 4.334 of the SA it is stated that, as the relocation site is outside of the AAP boundary and no relation is known then uncertainty is added to the scoring in the assessment. We also question why the Councils have departed from the position that was taken in the November 2014 Interim Sustainability Appraisal report (paragraph 4.3.6, page 37), which stated that the impacts of the relocation on sustainability objectives were uncertain – as it would depend on the location and nature of the site, with potential indirect and cumulative effects needing to be considered in more detail, should the relocation of the WwTW be taken forward. All options now presented look to take the relocation option forward, but this work has not yet been undertaken.

Additionally, we would question why the SA/SEA does not commit to the provision of a new WwTW and provision for sufficient sewage treatment works and wastewater capacity to cope with the additional demand that will arise from implementation of the Plan. There appears to be no such commitment within the current version of the NECAAP, which suggests a key component of the programme has been deferred for consideration at a later date which could represent a legal deficiency. The HRA (paragraph 5.6) recommends that policy wording is strengthened to ensure the NECAAP *commits* to the provision of a new WRC and that there is provision for appropriate upgrades and improvements to cope with the additional demand that will arise from development from the plan. We cannot see how this is possible in light of the draft SA/SEA's approach, which seeks to disengage itself from the relocated WwTW with continued reference to the DCO process. The DCO process will be subject to the EIA Regulations but this would not inform the AAP. The AAP should therefore be assessed under SA/SEA to include the relocation of the WwTW as an intrinsic part of the plan in order to be legally compliant.

Document details:	
Which document are you commenting on? (please tick)	<input type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input checked="" 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)	General comment on overall approach to SA and SEA in defining the project/implementation of the plan
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
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<p>Related to our comments on the SA/SEA process, we note that the Draft Habitats Regulation Assessment (HRA) does not consider the effects of relocating the WwTW as part of the same land use plan. This is confirmed at paragraph 4.7 of the HRA, which states that “[a]ny development resulting from the NECAAP would take place within the boundary of North East Cambridge”.</p> <p>In addition, the HRA does not assess the relocation of the WwTW “in combination” with the NECAAP as an “other plan or project” (in accordance with guidance set out in the 2018 document, Managing Natura 2000 Sites).</p> <p>We would also question the reliance that the HRA places on the HRAs that have been carried out for other local plans. This is for two reasons. Firstly, we are concerned that there is a significant disparity in terms of what was assessed in the local plan HRAs and what is now being proposed in the NECAAP; the relevant local plan policies did not include the quantum of development that is currently set out in the Draft NECAAP. Secondly, some of these other HRA documents referenced predate significant recent European Union case law on this subject (e.g. People Over Wind and Holohan). As a result, these documents may potentially not be compliant with up-to-date principles. At the very least, the NECAAP HRA should provide reasons as to why the assessments relied upon are considered to be robust.</p> <p>We consider that the HRA for the NECAAP should consider the likely significant effects of the relocation of the WwTW, if it is not part of the Plan itself, then in combination as an “other plan or project”. The WwTW is a project that cannot be considered insignificant in scale, which is intrinsically linked with the proposed development of the NECAAP. The effects on European sites of the relocation of the WwTW need to be properly considered in combination with the NECAAP proposals.</p>

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<p>Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)</p>	<p>Policy 1: A comprehensive approach at North East Cambridge</p>
<p>Is your comment (tick one):</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object</p>

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.

Draft Policy 1 states that the Councils will work to secure the comprehensive regeneration of North East Cambridge during the plan period, in particular the creation of a new high quality mixed-use city district, providing at least 8,000 new homes, 20,000 new jobs, and new physical, social and environmental infrastructure. Draft Policy 1

The Draft Policy references both the Spatial Framework (Figure 10) and Land Use Plan (Figure 11), as shown below.

Figure 10 (Spatial Framework)

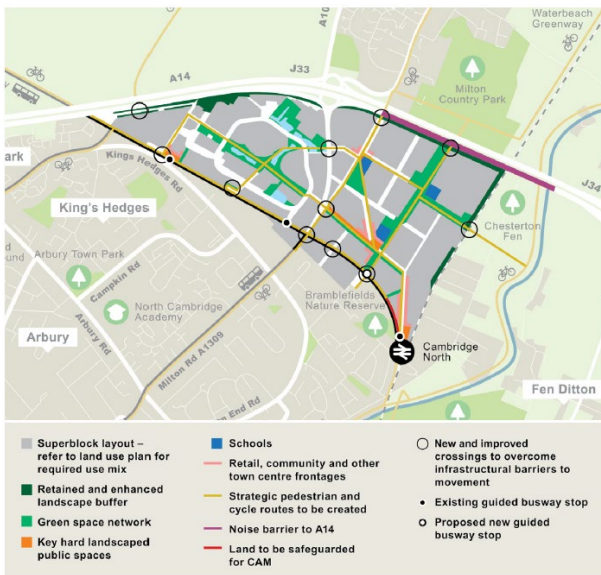
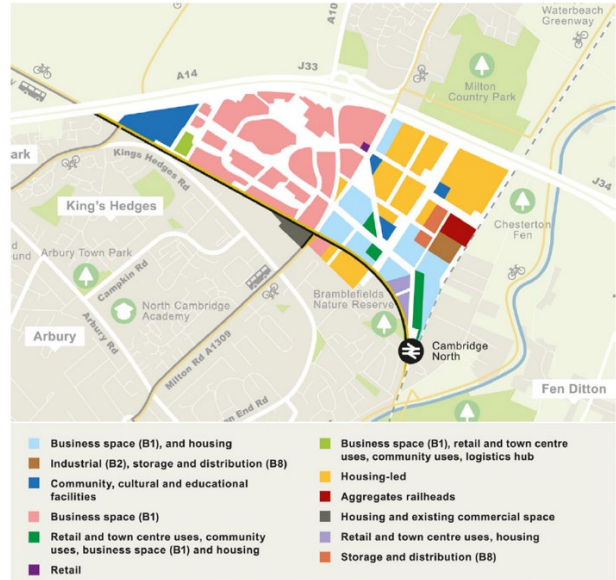


Figure 11 (Land Use Plan)



We have concerns regarding the quantum of development required within Draft Policy 1, and particularly the specified provision of **“at least 8,000 new homes”** (emphasis added). Given that the vast majority of these homes are to be provided on the eastern part of the Action Area (as shown in Figure 11, Proposed Land Uses), we are concerned that such a strategic-scale housing allocation should be focused on such a relatively small and highly constrained site. In addition to the 8,000+ proposed dwellings, Draft Policy 1 requires the provision of 20,000 new jobs and new physical, social and environmental infrastructure including three primary schools and safeguarded land for a secondary school.

Compared with strategic sites such as Cambourne, Northstowe and Waterbeach, the scale of residential development proposed is comparable, but necessitates residential densities that are unprecedented in the Cambridge area (see further comments on density below, re: Policy 9).

Whilst the NEC area is allocated in both the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018 (Policies 15 and SS/4, respectively), the Site is identified as a high-quality mixed-use development, primarily for employment within Use Classes B1, B2 and B8 as well as a range of supporting commercial, retail, leisure and residential uses (subject to acceptable environmental conditions). Whilst the local plan policies state that the amount of development, site capacity, viability, timescales and phasing of development are to be determined through the preparation of the AAP, we are of the view that the quantum proposed in the Draft NECAAP does not reflect the relevant policies within the adopted development plans. If the NEC Site is to be brought forward for the amount of development that is currently proposed, then this increased scale should be considered for allocation within the emerging Greater Cambridge Local Plan through the local plan process.

On a related note, the large number of unresolved constraints on development at NEC raise serious concerns regarding viability and delivery. Draft Policy 1 and the associated plans (Figures 10 and 11) provide very limited flexibility to accommodate local environmental factors, site constraints and market forces as land parcels come forward for development over time. In the meantime, we consider that the proposed quantum of development and the associated parameter plans should be considered indicative only. We remain of the view that requiring a minimum of 8,000 dwellings is too much, given both the size of the area allocated for housing and the various site constraints that remain at the time of the policies being drafted.

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 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>Draft Policy 4c requires the implementation of a Sustainable Drainage System (SuDS) across NEC in accordance with the Cambridgeshire Flood and Water SPD in order to minimise the risk of flooding. The policy goes on to require priority to be given to the use of environmental improvements, with SuDS naturalised to enhance green and blue infrastructure.</p> <p>The accompanying Cambridge Northern Fringe East Area Flood Risk Assessment confirms that pluvial flood risk will be a constraint on any development proposals and areas of open space will be required to manage this risk, which may have an impact on the deliverable density of any proposals. To address this, the separate report on Surface Water Drainage Space Allocation for Master Planning (2019) advises total storage requirements for the area of approximately 120mm per square meter of impermeable surface, depending on the type of feature. This would equate to between 10-15% of the overall development parcel with interception storage requirements met through green/blue roofs, rain gardens, permeable paving and other vegetated features. As the site has limited gradient, the majority of the features should be on the surface and swales used to convey the water long distances to minimise any pumping requirements.</p> <p>Reliance on underground attenuation tanks will likely increase where densities are higher within the AAP and open space is limited. The overall quantum and density of development shown in the spatial framework raises the question of how the surface water demands of the AAP will be met satisfactorily when considering the preference shown by the LLFA on other sites for open surface solutions such as swales – an example being Land North of Cherry Hinton.</p>

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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 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. Please copy this page for each policy or part of the document you are responding to.</p>
<p>Draft Policy 5 requires development proposals to deliver a minimum of 10% net gain in biodiversity value through a number of listed measures, of which 1 and 4 require:</p> <ol style="list-style-type: none"> 1. Provision of measurable improvements in the size, quality, diversity and relationship of the site's habitats, to deliver a coherent and high-quality ecological network as part of the wider green infrastructure network, landscape character and place making; 4. Delivery of coordinated habitat and water quality improvements to the First Public Drain, Milton Country Park and Chesterton Fen. <p>The above measures rely on betterment to the site's existing habitats as well as green connections and an ecology network across the AAP area. The brownfield or open mosaic habitats present in the siding and WwTW are less common in Cambridge and are distinctive for their range of habitat and species. They also provide multiple opportunities for wildlife to thrive as reported in the NEC Biodiversity Assessment. There are also protected and notable species through NEC including water vole, roosting bats, reptile populations and notable plant and invertebrate species. These ecological features will present a high bar from which an additional 10% net gain is to be achieved. They will also present potentially significant constraints upon some development activities and a commitment in the spatial framework to their delivery.</p> <p>This is currently not the case in the AAP boundary area, as it does not include Chesterton Fen, which is identified in the Biodiversity Assessment as key to providing compensatory habitat for the loss of the open mosaic habitats in the sidings and Cambridge Waste Water Treatment Plant. It is also not clear whether land ownership will be a barrier to delivering this area of compensatory habitat. Therefore, we would suggest for its inclusion and commitment in the AAP area. As stated</p>

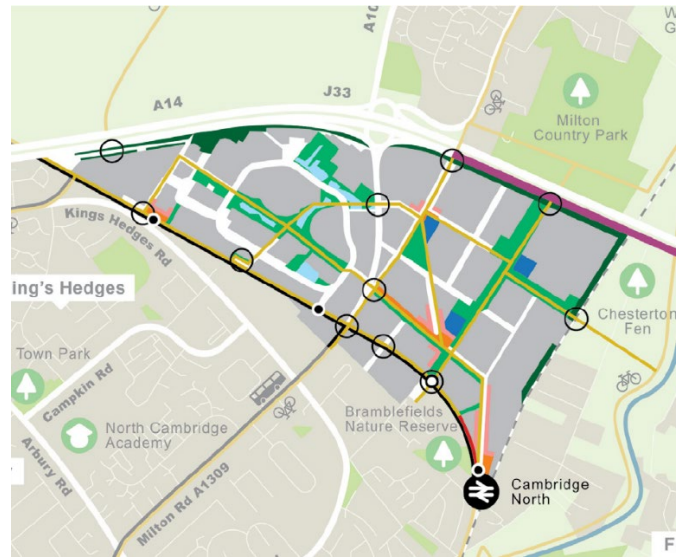
in Policy SS/4(3) of the South Cambridgeshire Local Plan, **“The final boundaries of land that the joint AAP will consider will be determined by the AAP”**.

The existing biodiversity on the site, and the proposed quantum and density of urban development makes the 10% net gain in biodiversity value in Draft Policy 5 a very ambitious and potentially unachievable target. As can be seen below, the recommended biodiversity opportunities and green infrastructure networks set out in the Biodiversity Assessment appear to be tightly confined and reduced by the allocated development area within the AAP’s Spatial Framework.

NEC Biodiversity Assessment



NECAAP Spatial Framework



This leads us to question whether the quantum of 8,000 units and 202,900sqm of new employment, commercial and community space is too much for this site. Conversely, is the amount and size of planned off-site compensatory habitat large enough to deliver a 10% net gain across the APP when considering the policy drive to make best use of land? On a related note, we would also question whether the SA/SEA and HRA processes can be considered to be comprehensive and robust, if Milton Country Park and Chesterton Fen form an intrinsic part of the NECAAP and yet these locations are treated as being off-site.

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 type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
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<p>Draft Policy 8 sets out support for the provision of new or enhanced open space and recreation sites/facilities. It states that regard will need to be had to the Cambridge City local standards of provision of all relevant types of open space (Appendix I, Cambridge Local Plan 2018) and the Councils' open space and sports strategies. Draft Policy 8 sets out an expectation that all open space requirements will be met on-site.</p> <p>We are concerned that the scale of development proposed within the NEC Action Area necessitates the provision of significantly more open space than can possibly be accommodated on-site.</p> <p>An estimated total population of around 19,400 people (Retail Evidence Statement, paragraph 54) would bring an associated requirement for the following open space and recreation provision, in accordance with Appendix I of the CLP 2018:</p> <ul style="list-style-type: none"> • Outdoor sports facilities (1.2 ha per 1,000 people) = 23.3 ha; • Indoor sports provision (1 sports hall for 13,000 people, 1 swimming pool for 50,000 people) = 1 sports hall plus further off-site contributions; • Provision for children and teenagers (0.3 ha per 1,000 people) = 5.82 ha; • Informal open space (2.2 ha per 1,000 people) = 42.7 ha; and • Allotments (0.4 ha per 1,000 people) = 7.8 ha. <p>This evidences our assertion that the proposed quantum of residential development is too great for the size of the NEC Action Area.</p> <p>The delivery of 8,000+ high quality dwellings, particularly at high densities, requires adequate space within the wider site to ensure that there is provision for recreation and sport for the</p>

residential population (and amenity space for local workers). As demonstrated above, the City Council's own adopted open space standards demonstrate that the Site is unable to provide the on-site provision that should be delivered to support well-designed new homes. Improving connectivity with neighbouring areas of existing public open space does not, and should not, provide a substitute for the appropriate on-site provision recreation and sport. We remain concerned that the adjacent Chesterton Fen area is not secured within the boundary of the NEC Action Area (see comments above re: Policy 5).

The Coronavirus Pandemic has changed people's mindsets, attitudes and amplified the intrinsic need for access to assets that facilitate healthy living and wellbeing. Policy emphasis should be upon ensuring that all future developments deliver high quality open spaces and a framework that facilitates a high quality of life that future residents and workers expect. The NEC AAP should be a flagship scheme in this regard, with the quantum of residential dwellings set at a reduced level that allows for all supporting infrastructure to be delivered on-site, including space for recreation and sport.

Document details:

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<p>Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)</p>	<p>Policy 9: Density, heights, scale and massing</p>
<p>Is your comment (tick one):</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object</p>

Comments:

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The Draft Policy states that “**development densities and building heights should not exceed those identified on Figure 21 and Figure 23**”. Figure 21 (Building Heights) shows development across the site ranging from building heights of between 4-5 and 13 storeys. Figure 23 (Residential Densities) provides the corresponding residential densities map, showing densities of between 75 and 385 dwellings per hectare.

Figure 21 (Building Heights)

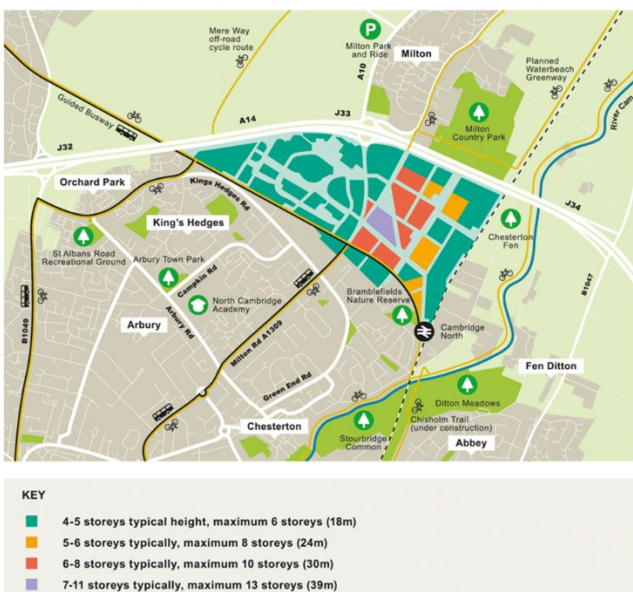


Figure 23 (Residential Densities)



Draft Policy 9 clearly indicates that the heights and densities shown on the maps represent upper limits for development across NEC. Whilst we welcome the identification of these figures as maximums, we are of the view that the building heights and densities remain too great when considering the location of NEC Action Area within the historic city of Cambridge; the existing site constraints; and the proposed mix of uses.

This said, we recognise that the heights and densities proposed are necessitated by the high quantum of development that Draft Policy 1 seeks to allocate to the Action Area (see separate comments to Policy 1, above). Our representation to Draft Policy 9 therefore corresponds closely with our representation to Draft Policy 1.

Compared with strategic sites such as Cambourne, Northstowe and Waterbeach, the scale of residential development proposed in NEC involves building at residential densities that are unprecedented in the Cambridge area.

The NEC Typologies Study and Development Capacity Assessment (January 2020) provides a range of example developments at high density. However, we note that none of these include developments of circa 8,000 dwellings except for Hammarby Sjostad in Stockholm (9,000 units at 145 dph). Whilst there are examples in Cambridge and London of high-quality, high-density development, it typically comprises a smaller total quantum of development, e.g. CB1 Ceres in Cambridge (150 units at 300dph), S3 in Eddington, Cambridge (186 units at 261 dph) and Aylesbury Estate in London (260 units at 244dph). We are concerned that the high-density residential development proposed at NEC will not be in keeping with the site and surrounding area, including landscape and visual impacts on the local and wider cityscape.

Table 5 of the NEC Retail Evidence Statement (February 2020) sets out the proposed residential mix for the NEC Area (see below). This indicates a total 8,400 dwellings, of which 92% will be flats and 8% will be 3 and 4-bedroom houses. Of all dwellings, 70% comprises of 1 and 2-bed flats. This housing mix will generate an estimated total population of around 19,400 people (Retail Evidence Statement, paragraph 54).

Table 5: NEC Residential Housing Mix and Total Unit Count

Mix	1 Bed Flat	2 Bed Flat	3 Bed Flat	4 Bed Flat	2 Bed House	3 Bed House	4 Bed House	TOTAL UNITS
Total Units	2,367	4,019	1,238	151	0	410	213	8,400
% of Total	28%	48%	15%	2%	0%	5%	3%	

Source: Greater Cambridge Councils

We would question whether the proposed dwelling mix has been determined by a comprehensive analysis of population projections and housing need for the area – or whether the high proportion of small flats is necessary in order to achieve the high numbers and densities that are proposed.

With the anticipated permanent changes to our day to day living as a result of the Coronavirus Pandemic, we believe that there should be a reconsideration of the policy approach in relation to residential mix. In terms of preference, there has been a clear move towards people seeking more space within their homes, both internally to facilitate home-working and externally in terms of private garden space. We are concerned that the housing market in Cambridge may not support the level of apartment development that is currently proposed within the Draft AAP. Whilst this impacts the parameters set out in Draft Policy 9, this also has a knock-on effect on Draft Policy 1. We consider that a reassessment of this policy approach is required to ensure the long term viability of the project.

Again, the above raises the of question whether the quantum of 8,000+ units and other proposed employment, commercial and community uses and associated policy objectives is too much for the NEC Action Area.

Document details:	
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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Policy 13b (Affordable housing) and Policy 13c (Build to Rent)
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. Please copy this page for each policy or part of the document you are responding to.</p>
<p>Draft Policy 13b requires 40% of new homes to be delivered as affordable housing, comprising a minimum of 60% social/affordable rent and 40% intermediate housing products. This reduces the level of social/affordable rent from the existing 75/25 split required in Cambridge City Council and 70/30 split in South Cambridgeshire Council. This is reasoned on the basis that this could help to provide a wider range of housing options beyond the more traditional shared ownership model, and also support local businesses by improving provision of housing which is accessible to a wider range of local workers.</p> <p>The National Planning Policy Framework says that plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan. Policy requirements for developer contributions should be informed by proportionate evidence of infrastructure and affordable housing need and be assessed for viability <i>at the plan-making stage</i> in accordance with guidance.</p> <p>We note that there is a lack of any viability evidence in the NECAAP supporting documents and evidence base. This is a concern for several reasons.</p> <p>The majority of the housing allocation is proposed to the northern half of the NEC site where the current WwTW lies and where there will be significant costs in terms of remediating the land. In addition, there will be costs associated with land assembly and the use of Compulsory Purchase Order or compensatory agreements for existing businesses that will be relocated off the site. It is unclear to what extent these issues have been accounted for in setting out the viability of the plan and the level of affordable housing requirement.</p>

This is a critical issue not only for meeting local affordable housing needs but also ensuring policy compliant affordable housing levels can be delivered on site rather than being displaced elsewhere. The total quantity of affordable housing would amount to 3,200 homes, which represents a significant proportion of the area's affordable housing need. It would not be possible to absorb such a high level of affordable housing through windfall or rural exception sites once the AAP is adopted and therefore understanding the viability of implementing the plan is critical at this stage of policy drafting.

Our concerns regarding the lack of financial viability evidence extend to Policy 13c and the proposal for a maximum of 10% Build to Rent (800 units) across all housing within the AAP, comprising a minimum of 20% affordable private rent units. Built to Rent is a relatively untested product within Cambridge and would likely achieve lower land sale values compared to normal market products in this area. We would question whether this has been considered in the financial viability review work that supports the AAP. Also, how applicable is the research on Built to Rent to the Cambridge market? The AAP's Housing Topic paper references evidence to Build to Rent demand within a document titled 'Private Rented Sector (Build to Rent) research – national and emerging local' but this does not appear to be published on the NECAAP consultation page. We therefore do not know the assumptions on likely take-up of Build to Rent at NEC and the impacts on the financial viability of implementing the plan, along with delivery of affordable housing delivery.

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 type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
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<p>Draft Policy 14 requires the on-site provision of a range of social and community infrastructure, including three primary schools and safeguarded land for a secondary school.</p> <p>The Education Topic Paper (2020) provides a range of scenario modelling in terms of child yield and the corresponding land take for schools. Scenario Options 1-5 identify that the quantum of residential development proposed at NEC would generate between 2,200 and 3,675 primary age children (10.5-17.5 forms of entry). The corresponding secondary school children generated are within a range of 1,375-2,297 students (9.2-15.3 forms of entry).</p> <p>Reflecting on the proposed approach the Topic Paper states (page 16):</p> <p>“At present, the masterplan shows the location of two primary schools and one co-located with a secondary school. At this stage, the Council considers the location of these schools to be appropriate. The provision of 3 sites would cater for the lower end of the range of provision required based on scenarios 1-5 above. A maximum of 5 sites may be required.”</p> <p>Scenario Option 6 has been followed by the Councils in the proposed approach to school provision; this is predicated on a dwelling mix that includes a high proportion of 1 and 2 bedroom homes, therefore reducing the number of school children generated to 1,348 primary (6.4 forms of entry) and 608 secondary (4.1 forms of entry). The corresponding land take is calculated to be 7.6 ha for primary and “N/A” for secondary. We note, additionally, that Scenario 6 includes the generation of 1,655 early years aged children (of which 927 would be eligible for funded provision). Whilst this is stated as being “factored into Primary School” (tables on page 18), the supporting text states that provision within the primary schools (calculated at 7.6ha) will not provide for the 927 early years children and therefore “complimentary private provision will also be required”.</p>

Whilst the preferred option is for off-site provision of secondary school provision, the Topic Paper identifies a number of key uncertainties regarding this approach. The opening of Cambridge City Free School and Darwin Green as off-site options are both dependent upon funding agreements. In addition, there is strong community support to include a secondary school within NEC. We note that secondary schools of between 7 and 10-form entry require a land take of between 7.7-10.6ha. We have not found any evidence regarding the size of the safeguarded site at NEC. We have concerns that the size of site safeguarded at NEC is inadequate to allow for a secondary school to be developed in the future to meet the County Council's standards, should on-site provision be required. Alongside the clear requirement for all school sports pitches to be provided on-site, we are of the view that all of the required and safeguarded school sites at NEC should be sized to the County Council's expected standards. We cannot find any evidence of County Council support for reduced site sizes or multi-storey school buildings.

Whilst there may be examples of the successful co-location of primary and secondary schools in other neighbourhoods (e.g. Northstowe and Chatteris), there is no clear strategy set out for NEC regarding what the safeguarded site will be used for if it is not needed for school use.

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Policy 22: Managing Private Motorised Vehicles
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

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<p>Draft Policy 22 sets out a maximum vehicle trip budget for the AAP on to Milton Road during AM and PM peaks. In order to comply with this trip budget the area as a whole will need to significantly reduce existing car-drive mode share provision of sustainable travel options and significant reductions in existing parking allocation to 0.5 spaces per dwelling as a starting point, with an expectation that lower levels will be achieved for all housing types and tenures.</p> <p>The supporting Transport Topic Paper sets out the requirements for modal share based on this trip budget, which for 27,000 jobs and 7,600 homes requires a reduction of vehicle mode share to 26% for employment uses and 10-13% for residential uses. We would question how achievable these targets are for such a large quantum of dwellings and employment uses?</p> <p>Looking specifically at the issue of “discouraging car use” as a key element of the Vision for NEC, we have the following comments:</p> <ul style="list-style-type: none"> • The NEC AAP introduces the concept of a vehicular trip budget for the NEC area, which effectively means that future levels of traffic flow along Milton Road and Kings Hedges Road are no different to existing levels of traffic flow. This is due to limited highway capacity, plus the negative impacts of unfettered traffic growth on air quality and place-making, amongst other matters. • Delivery of the vehicular trip budget requires a significant reduction in the car driver mode share for the area. For employment uses, the reduction is from an existing 71% to a future 29%. This is a significant and unprecedented reduction. The reduction in car driver mode share (for the AM peak) for residential uses is from an existing 29% to 12%. • The reductions will require existing employment uses within the NEC area to reduce their current levels of car parking, since car parking provision is inherently linked to car trip generation. It is unclear how this will be achieved. Trinity College, the owners of the

Cambridge Science Park, does have a car parking management plan that seeks no net change in the Science Park's car parking provision by 2030 compared to existing levels, but it does not seek to achieve a reduction in existing car parking levels. The car parking provision for Cambridge Regional College will need to nearly halve from 621 spaces (this is the current maximum demand) to 390 spaces.

- Future employment developments within the NEC area will have stringent car parking standards imposed on them, which can be deliverable for new developments. However, these car parking standards will need to be even more stringent if the existing employment uses in the area do not reduce their own levels of car parking significantly.
- For residential uses, achieving the vehicular trip budget will reduce average car parking provision to no more than 0.5 spaces per dwelling across NEC. This is unprecedented in Cambridge for such a scale of development.

These findings should be carefully considered by the Councils in considering the implications of the proposed strategy regarding car use at NEC. We would also highlight that the strategy of discouraging car use is heavily dependent upon the delivery of the CAM, new cycle routes and adequate rail services as alternative modes of travel, although the time horizons for the delivery of these projects remains unclear, if indeed some are delivered at all.

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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

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<p>Draft Policy 25 requires development at NEC to fully consider environmental impacts to ensure that the future health, quality of life, amenity and the natural environment are fully considered. Policy Section (h) makes reference to a noise barrier along the A14, stating that it will be assessed and integrated into the overall masterplan.</p> <p>Supporting text on the topic of noise acknowledges that:</p> <p>“The A14 traffic noise has widespread prevalent adverse impacts across a significant proportion of the Area Action Plan area. It is likely that a strategic site environmental noise barrier close to the A14 will be the most effective option to mitigate and reduce to a minimum adverse noise both internally and externally”.</p> <p>In addition, a number of site-specific noise sources are identified including transport and industrial uses. As well as the WwTW, the Veolia Waste Transfer Station site lies in the heart of the NEC Action Area. This waste site is safeguarded in the adopted Minerals and Waste Local Plan. At the time of consultation, neither of the sites have a strategy for relocation off-site and represent major constraints to the proposed development.</p> <p>Looking specifically at the issues of acoustics and vibration, the following conclusions can be drawn:</p> <ul style="list-style-type: none"> The current proposals locate the most noise-sensitive uses, such as housing, on the east end of the site. The Land Use Plan (Figure 11) indicates that a high proportion of the proposed residential development will be sited close to the A14, although noise impacts from road and rail traffic will continue to be a long term issue in this area (as set out in the Noise Model and Mitigation Assessment, February 2020). By contrast, the Land Use Plan proposes the allocation of commercial and other less noise-sensitive uses further away. The

proposed arrangement of land uses poses a significant challenge to design in terms of both façade requirements and ventilation / cooling.

- A better and more balanced design could be achieved through locating less noise sensitive uses along the perimeter of the site in taller buildings, which would in turn act as a screen to the lower residential buildings in the centre of the site, protecting them from the dominant noise sources. This would be beneficial for the ventilation and cooling strategies of the residential buildings, bringing them more in line with the Councils' preferred natural ventilation approach. It would also provide quieter external amenity areas, promoting the wellbeing of the occupants.
- Vibration and structure-borne noise from trains to and from Cambridge North station and from the future CAM network does not seem to have been considered. Moving residential buildings away from these sources would prove successful in reducing the impact of vibration and structure-borne noise on the foundation design of the buildings.

The findings have an important bearing on the proposed layout of the NEC Area. There are fundamental implications for the Spatial Framework (Figure 10) and Land Use Plan (Figure 11), with a consequential effect on Draft Policy 1 and other elements of the Draft NECAAP. However, we consider that amenity issues such as noise and vibration are of utmost importance when planning and designing a high-quality new city district such as NEC.