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Greater Cambridge Shared Planning Service

**Place & Economy**  
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### **North East Cambridge Draft Area Action Plan Consultation**

Thank you for consulting Cambridgeshire County Council on the Draft Area Action Plan for North East Cambridge. Please find below our response to the consultation questions. These have also been added to the consultation web site.

In addition we have some further comments that make our full response to the draft plan, and we hope you can consider.

Please contact me should you have queries.

Yours sincerely

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**NORTH EAST CAMBRIDGE DRAFT AREA ACTION PLAN - CONSULTATION  
CAMBRIDGESHIRE COUNTY COUNCIL CONSULTATION RESPONSE  
October 2020**

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

- 1.1 County officers have been involved in the development of the draft plan over the past two years. The overall approach to bringing forward the area for redevelopment is broadly welcome and its vision for an inclusive, walkable, low-carbon new city district is supported.

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

- 2.1 The site will need to take advantage of additional walking, cycling and public transport links currently being planned such as cycle routes from Waterbeach and the Cambridge Biomedical Campus and the GCP's Waterbeach to Science Park public transport link. Public transport to the city centre and other areas of the city will also be key to further reducing the car mode share of the site. The CPCA's plans for CAM will contribute to this offer if a tunnelled section from the city centre connects into the site and eventually incorporates the St Ives and Waterbeach extensions.
- 2.2 Connections into these links are well identified in the spatial framework however it will be critical for the detailed design of each area to ensure that a cohesive network of cycle and walking routes is created throughout the area. The section on mobility hubs in policy 19 is welcomed as a means of trying to provide sufficient flexible space to accommodate new and emerging technologies.
- 2.3 Milton Road currently severs the east and west sides of the AAP area and is an inhospitable road to cross for pedestrians, cyclists and other non-motorised users. The plan contains proposals to provide segregated crossings of Milton Road for these groups. The principle of these is supported but it is noted that much more work is required as the detailed planning of the site comes forward to work up the exact design of these and input from the highway authority will be required throughout.

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

- 3.1 It is noted schools are located at the district centre and Cowley Road neighbourhood centre. Schools should be well connected to provide easy access. Being located within the new community means they are accessible and promote sustainable travel. The schools require good cycle and walking links from when the schools open.

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

- 4.1 In recognising the ambition to provide a mixed development and allow a more sustainable development reducing the need to travel, the mix provides the ability to live and work in North East Cambridge.
- 4.2 The spatial framework and table in Policy 13a shows the distribution of 8.000 homes across the NEC area that is broadly supported. It is noted Policy 13a states proposals for residential development will need to have regard to the councils' latest evidence on housing need as set out in the Joint Housing Strategy (or any future update)'.
- 4.3 Measures to ensure an appropriate mix of development is delivered, in particular to not promote journeys into the area are included in the AAP. Policy 13d includes the need for developers to demonstrate how affordable private rent properties, expected as part of their developments, will be targeted to meet local worker need. Policy 15, covering shops and services seeks retail to beat a level to serve the local community.

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

#### Education

- 5.1 Note the housing mix can have a significant impact on the number of children and therefore the education need. The current ask for 3 primary school sites, and reserved land for a secondary school co-located with one of the primary schools is based on early housing mix proposals. Flexibility is required because it is only when the majority of residential development has gained outline planning permission, and the number of houses and mix is fixed as part of the planning permission, the County Council can say with certainty the final education requirements.
- 5.2 Education supports the allocation of 3 primary schools within the site. These will include early years provision. Being located within the new community means they are accessible and promote sustainable travel. The schools require good cycle and walking links from when the schools open.
- 5.3 A secondary school site is safeguarded within the plans, to be co-located with one of the primary schools. This is welcomed, noting it is not possible to confirm the need for new secondary school on site until such time as there is greater certainty as to the housing quantum and detailed mix. i.e A sufficient number of homes have been granted outline planning permission.
- 5.4 Acknowledging the unique built environment proposed for North East Cambridge and in relation to policy 10e, the Cowley Road Neighbourhood Centre, the need to look more radically at best use of space in a high density development is noted. The last bullet point of the policy states, "Opportunities for schools to be part of a mixed use building should be explored." It should be

noted this needs to be without detriment to the quality of education provision and assurance for the securing of the building and land.

- 5.5 The draft AAP indicates the delivery of a secondary school, (should on-site provision be needed), will be at towards the end of the plan period.

“Local secondary school provision will be kept under review throughout the plan period to determine whether a secondary school at North East Cambridge is required and when it will need to be delivered. Based on the housing trajectory for the Area Action Plan, it is anticipated that if it is required, then it is likely to be delivered towards the end of the plan period.”

In the programme at the end of the Draft AAP shows the secondary school being opened in the period 2035-2040. This is at a too late a stage in development to provide the Council with the requisite flexibility to plan and deliver sufficient places.

- 5.6 With regard to phasing, it is assumed secondary school provision will be required early in the development, depending on demand for places across the wider area and housing mix from early stages of the development. There may be the option of providing a temporary facility off site for a duration of time before the delivery of new secondary school facilities (if required). Should a new secondary school be required on site, the delivery of such a facility could be from an early stage of development.

- 5.7 Policy 15 Shops and Local Services. Inclusion of full day-care (education) use should be included to enable commercial providers to set up full-day care provision (Southern Fringe demonstrates the negative impact of having a shortfall of this type of commercial opportunity)

- 5.8 Policy 2 states non-residential buildings are to meet BREEAM excellent. Furthermore it states.

“Alternative construction methodologies, for example Passivhaus, will be supported subject to early engagement with the Councils to agree the approach.

The alternative to BREEAM excellent is very welcome and the County Council supports this. BREEAM excellent is not always an appropriate measure in the delivery of schools. The County Council is looking into PassivHaus as a more effective tool.

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

- 6.1 Note the densities and heights of buildings. The site is one of the last brownfield sites to be developed in Cambridge, and is very well connected.

Therefore there is sufficient provision to allow for a high density, urban quarter of the city to be located at NEC.

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

- 7.1 Open spaces should allow for a range of 'occasional' events that will help support community activities and sporting events. The use of open space by all ages needs to be considered and where appropriate facilities to promote their use provided. Policy 8 captures this in part but could be more explicit to ensure this is not overlooked when designing open spaces.
- 7.2 It is important to reflect on the value of open space since the Covid-19 pandemic. Access to sufficient open space of a high quality, particularly for residents in apartments, for which there is a high proportion proposed for NEC, is essential.

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

- 8.1 It is noted in Policy 5 development proposals will be required to deliver a minimum of 10% net gain in biodiversity value. The policy outlines the approach to delivering this. The policy has been informed by a site wide ecology study (2020). It is important developers view the 10% net gain as a minimum and take opportunities to exceed this where possible.
- 8.2 Policy 5 outlines the securing of appropriate habitat management and monitoring plans. These are crucial to ensure the 10% increase in biodiversity is met.

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

Trip Budget and connectivity

- 9.1 The vehicular trip budget approach to managing traffic within and in the vicinity of the site is welcomed and fully supported. Technical work demonstrated that the highway network in the vicinity of the area already operates at capacity in the peak periods and the development of the site in the traditional manner of predict and provide would not be acceptable. The shift towards 'decide and provide' – in essence deciding what transport characteristics the site should have and providing the means to achieving that - lends itself to this trip budget approach. Whilst dealing with the highway capacity issue, it importantly helps the site exploit the existing and planned sustainable transport links that will connect it to the wider network and will ensure that the detailed planning of the site will be around walking, cycling and public transport first.
- 9.2 The site is already well connected through the presence of Cambridge North station, the Cambridgeshire Guided Busway and its proximity to the Milton Park and Ride and the detailed planning of the site will need to exploit these existing links.

## Parking

- 9.3 One of the tools available to assist with the delivery of the site within this trip budget is that of parking control through the limited provision of car parking within the NEC area. The parking policies are welcomed and there is evidence from elsewhere in Cambridge that a strong approach to parking control, coupled with a range of travel alternatives can help encourage a significant shift to more sustainable modes. However, it is recognised that due to the fragmented nature of land ownership on the site, some sites will be able to make quicker progress towards the stretching parking standards than others due to, for example, the complexities of long term leases. The trip budget approach gives enough flexibility that developers can come forward with other measures including aggressive travel planning (which could include the use of car clubs) to ensure that their proposals remain within the vehicular trip budget, however a robust monitoring framework will be required to ensure that development does not continue if the trip budget is breached.
- 9.4 It is anticipated that due to the phased nature of parking reduction, coupled with the increasing offer of travel alternatives, aggressive travel planning measures, and a strong monitoring framework, the impact of parking reduction will be able to be well managed. It is however accepted that on a fringe site such as this, there will be the opportunity for parking to overspill into surrounding areas. If this happens and becomes a problem, areas that lie within Cambridge City could be considered for residents' parking schemes, the restrictions of which could be enforced by Civil Parking Enforcement. However, if this happens in areas that lie in South Cambridgeshire, a residents' parking scheme could not currently be introduced as the district is not covered by these powers.
- 9.5 Any move towards this will need to be initiated by South Cambridgeshire District Council as there are financial implications to Civil Parking Enforcement. However given the increasing number of major new developments and fringe sites that are being developed in the district, it is an issue that South Cambridgeshire District Council may wish to explore early in the plan period. It could provide an additional tool with which to help control any potential side effects of parking restrictions within new sites, should they arise.

## Cambridgeshire Guided Busway

- 9.6 It is acknowledged and understood that the Cambridgeshire Guided Busway, along with Milton Road, the A14 and the railway presents a barrier to opening up the NEC site to wider communities, especially to the south. The rationale for wishing to incorporate additional crossing points of the Busway is understood and from a connectivity point of view this principle is supported. However, as identified in the supporting text of the plan, the challenges of implementing additional crossings should not be underestimated. The Busway has the status of Statutory Undertaker afforded it by the Transport and Works Act Order under which it was constructed. Any changes to the Busway corridor will need to be considered at a higher health and safety level than a

highway as incidents in the area would be investigated under the jurisdiction of the Health and Safety Executive. This would involve a potentially lengthy legal process with no certainty at this stage of success.

- 9.7 As such, a developer or other body could not unilaterally implement or design in the crossing points identified in the spatial framework as set out in this policy. Policy 15(e) should be reworded to read as:

“Opportunities to introduce further crossing points should be actively explored, in particular those identified on the AAP Spatial Framework.”

- 9.8 Early engagement with the Busway team is encouraged to identify a way forward with this.

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

- 10.1 The vision in the Draft AAP is for North East Cambridge “to be an inclusive, walkable, low-carbon new city district with a lively mix of homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods.” Furthermore one of its principles is to “respond to the climate and biodiversity emergencies, leading the way in showing how we can reach net zero carbon.”
- 10.2 Policies 2-5 in the Draft AAP set how NEC responds to climate change. This includes meeting net zero carbon by 2050, a reduction in the use of water, 10% increase in biodiversity, and setting minimum standards for design and build. Policy 3 states an Area Action Plan wide approach to energy and associated infrastructure should be investigated and, where feasible and viable, implemented. The policies respond with proposals to mitigate impact, enhance natural capital and adapt to climate change. This aligns with the County Council’s Climate Change and Environment Strategy’s priority themes.

### **Further Comments**

#### Transport

- 11.1 In a broader context, it is noted that the status of the document is such that it does not carry any weight or commitment in determining planning applications. Given the lengthy timescales for the adoption of the AAP and the number of planning applications that are likely to come forward before this time, County Council transport officers have developed a position statement to outline how we intend to deal with such applications in the meantime. The position statement does not prevent planning applications from coming forward and seeks to deal with them in an equitable manner that doesn’t jeopardise the overall direction that the plan is moving in.

#### Fen Road Level Crossing

- 11.2 The position in the plan regarding the Fen Road Level Crossing is noted, as is the fact that a number of responses were received by the Shared Planning Service on the issue. Whilst acknowledging that it shouldn't be the sole responsibility of the AAP to resolve the current issues experienced by users of the crossing which are largely caused by the way in which the rail industry operates its level crossings, there is a wider issue of facilitating the growth in rail capacity along the this stretch of the rail network. While development on North East Cambridge will drive additional rail patronage into and from Cambridge North station, it is growth across the Cambridge sub-region and county / neighbouring areas that combined is likely to lead to demand for more trains on the line. North East Cambridge, in common with other large development sites immediately adjacent to stations on the line will be a significant contributor to this demand. Furthermore, with the strict vehicular trip budget that North East Cambridge will have, it is imperative that future increases in rail capacity aren't constrained through a lack of strategic planning. In the longer term if the crossing issue isn't resolved it will hamper the ability for extra rail capacity to be provided on this part of the rail network and could frustrate plans to accommodate growth of the local economy more widely
- 11.3 In order to ensure that increased rail capacity can be delivered on this part of the rail network in the future, there is a need to start exploring what long-term alternatives to the Fen Road crossing might be acceptable. Although the level crossing lies outside the AAP area, North East Cambridge could provide one of these alternatives.
- 11.4 If future work identified that alternative access were needed, and that a bridge or underpass of the railway between North East Cambridge and Fen Road was the preferred option, land in the North East Cambridge site for such a link would need to have been reserved for this. It is therefore considered that until such time that it is demonstrated that a replacement for the crossing will not need to go into the NECAAP site, land should be safeguarded for this purpose. This is to ensure that potential options aren't ruled out prematurely, rather than suggesting that the site should bear the cost of such a scheme.
- 11.5 Ownership of the problem is needed from a range of stakeholders, principally Network Rail the Local Planning Authorities, the Cambridgeshire and Peterborough Combined Authority as Transport Authority and Cambridgeshire County Council as the Highway Authority. Only through this joint ownership will the issue be moved forward and the issue of whether land needs to be safeguarded in the NECAAP area for such a purpose be thoroughly aired.