

To: Greater Cambridge Shared Planning

Response to North East Cambridge (NEC) Area Action Plan (AAP)

I strongly object to the NEC AAP in its current form.

I have answered your 'Ten Big Questions' (see below), along with further comments and questions under the following headings:

1. impact of relocation of sewage works;
2. council planning in the wider context;
3. the conduct of the NEC AAP consultation;
4. the extent of legal requirements placed on developers;
5. the manner in which Government funding and NSIP status have been secured and the adequacy of funding for the new sewage works, and
6. 'Ten Big Questions'

1. Impact of relocation of sewage works

My village is under threat from both Sites 1 and 2 as proposed by Anglian Water (AW). All the things you seek to achieve through the NEC AAP will be destroyed in whichever villages are chosen as the new location for the sewage works. See 'Ten Big Questions' for further details.

2. Council planning in the wider context

There is a danger that the AAP is setting in train a series of disastrous planning decisions which could hamper future economic and infrastructure development on the strategically important land at Site 2. This has enormous potential to benefit Greater Cambridge and is too valuable to waste on a sewage works. There is access under the A14 to enable expansion of the Science Park plus proximity to the guided bus and proposed CAM route as well as the Mere Way cycle route. Indeed, the 'unlocking' of NEC could result in the 'locking' of this key site.

In a wider planning context, NEC and the associated sewage works relocation seem to be advancing stand-alone from all the other projects in the pipeline (Airport site, Marleigh, Waterbeach New Town, A10 widening, CAM metro, Mere Way cycle route, Science Park expansion, recycling centre expansion, new Police Station). There is a risk that building a sewage works to a constrained budget will prevent further key developments and that it will need moving again.

As taxpayers we urgently need to see a coherent planning approach being taken to have confidence that our money is being invested wisely. It seems bizarre that the impact of moving the sewage works is being given no consideration at all by Greater Cambridge Planning despite it being a highly significant impact of the AAP.

3. The conduct of the NEC AAP consultation

Despite the sewage works relocation being a major impact the AAP does not quantify the enormous cost to the taxpayer or make any mention of the associated colossal carbon costs, destruction of Green Belt, wildlife, amenity and heritage or the impairment of lives and properties in villages.

The City Council has driven the relocation project and the County Council sets waste policy ie the inadequate 400m 'buffer zone' for sewage works. Neither organisation has put forward leaders for scrutiny by residents in relation to the relocation. For such an important project affecting so many people this appears to show an utter lack of respect for and accountability to the communities that these organisations are supposed to serve. We seem to have arrived at this position via an opaque and undemocratic process involving multiple layers of local government, which has been invisible for most residents and it appears we have no local redress (see also 5. below for comments on 2019 consultation).

An effective consultation cannot be achieved on Zoom during a pandemic and anyone without IT is almost completely disenfranchised.

I was told by a Greater Cambridge planning officer that residents are muted at webinars in case they say anything offensive. Thus there is no opportunity for follow up questions eg:

- *Q (recording of first webinar): How can the development be stopped? (clearly a genuine question from someone concerned about the sewage works).*
- *A: I'm not sure you would want to (the question was thus deemed answered, with no right of reply from muted resident).*

This all gives the impression of a council determined to impose its ill-considered plans irrespective of residents' views and common sense.

4. The extent of legal requirements placed on developers

To what extent are the aims of the NEC AAP enshrined in legal requirements placed on developers? NEC seems doomed to be yet another development where the affordable housing, community facilities, energy and water savings etc never materialise.

5. The manner in which Government funding and NSIP status have been secured and the adequacy of funding for the new sewage works

A condition of the Housing Infrastructure Fund (HIF) is that the project has local support. It appears that HIF funding was obtained on the back of the 2019 consultation on NEC AAP. At that point the move was hypothetical only, with no indication of possible sites for relocation or consideration of issues and impacts. At best, the villages which are now under threat were treated as peripheral to the consultation with no exhibitions, community liaison forum or local ward member forum. Surely the 2019 consultation cannot be considered as indicative of support and a valid basis for HIF funding when stakeholders were totally in the dark on proposed sites and the relocation was outside the scope of the consultation? Comments on the AW e-consultation indicate that there is strong support to leave the sewage works where it is, a contaminated brownfield site.

I question whether the funding is sufficient to secure both the best site and best technology for a new sewage works and whether the shortlisted sites have been chosen based on cost.

Nationally Significant Infrastructure Project (NSIP) criteria apply to sewage works of 500,000 population equivalent. The Odournet report in your own library of evidence-based documents cites *'the works serves a population equivalent of approximately 165,000'*. There is no evidence provided as to why we need such a large sewage works.

6. 'Ten Big Questions'

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

I strongly object to your vision for NEC in its current form because of the associated relocation of the sewage works to Sites 1 and 2 and the seeming lack of coherent vision for the wider area. This risks a planning disaster for Greater Cambridge with the particular danger of 'locking' strategically important land at Site 2.

The NEC vision seems unrealistic; too much is being squeezed into too little space. I question the chances of everything promised in the AAP being delivered.

The definition of 'affordable' is not clear.

Examining some of the key aims of the AAP, the vision for NEC will have the following direct effects on the villages:

'Healthy and safe'; Residents, businesses, schools, nurseries and a hospital will face multiple health and safety risks; contaminated bioaerosols, nausea and detriment to wellbeing from living with the stench of sewage and sludge processing, commissioning and decommissioning work. Flies, mosquitoes and rats. Noise, dust and vibration from construction work. Plus daily HGV traffic, including sludge transport, causing pollution and endangering school routes on overloaded, narrow and twisting roads. Sites 1 and 2 would result in the closure of a long established fruit farm and a recreational facility at Rectory Farm.

'Green spaces' and 'Cultural Placemaking'; Your evidence-based document describes the area between Impington and Milton thus: *'..... not recognised in published landscape character assessments and townscape assessments as making an important contribution to the setting of Cambridge. It contains few notable landscape or cultural heritage designations with very few public rights of way and no recreational routes of regional or national importance.'* This area actually contains the Mere Way, used by walkers, joggers and cyclists for health and recreation. Mere Way is also a heritage asset, a Roman Road, as well as an incredible wildlife corridor with pleasant views across to mature trees.

'Biodiversity'; Our village conservation area is rich in wildlife which will suffer (little owls, tawny owls, barn owls, turtle doves, swifts, bats, common toads, hedgehogs, deer, foxes, badgers).

'A real sense of place'; Whichever villages are forced to accept the sewage works will have a new 'sense of place', where quality of life and property values are diminished.

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

No. If the sewage works are relocated at Site 1 or 2 then Mere Way will be severed or rendered an unappealing route. Mere Way is supposed to be the cycle route from Waterbeach New Town, as well as existing villages.

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

No. Waste water treatment is a key activity. The best place for the sewage works is in its existing location. Under the proximity principle the City should deal with its own waste and not dump it on the villages. Otherwise a location well away from residential areas and strategic sites should be found.

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

8000 homes equates to roughly 10,500 people in employment. Creating 20,000 new jobs will lead to a housing shortfall of 9,500.

Covid-19 is changing the employment landscape, perhaps permanently. Surely the provision of commercial space should be re-evaluated in this light.

Orchard Park never got its commercial space which was also supposed to act as noise attenuation. What legal guarantees are in place to ensure that the development is delivered to plan?

5. Are we planning for the right community facilities?

What legal guarantees are in place to ensure delivery of the facilities you promise?

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

It is hard to see how the vision for NEC building heights fits in with the stated vision for Cambridge of a city surrounded by green space with a 'necklace' of villages.

Aesthetically, looming tower blocks of 13 stories are completely out of character for Cambridge and could make the district square gloomy and dark.

It has been calculated that the population density will be more than twice that of Inner London. This does not sit with claims that it will be a healthy and safe place to live.

Living on a decommissioned sewage works seems a highly unattractive prospect. There is nothing in your evidence-based document library to show that this is safe practice.

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

The AAP 'borrows' Milton Country Park and Chesterton Fen, both of which lie outside NEC. The Country Park is already very well used and there is no information as to how the capacity could be increased. Otherwise NEC itself seems deficient in Green spaces which would make Mere Way cycle path even more important to allow people to access open countryside.

What legal requirements will be placed on developers to ensure that these facilities materialise?

Will the public spaces be well maintained and safe?

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

According to your ecological summary there is very little habitat in NEC (a drain and one hedgerow). Improving it should not be difficult but it comes at the expense of the destruction of Green Belt which will be concreted over to build the new sewage works. NEC is effectively being built on Green Belt. This is not mentioned in the AAP.

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

It is not enough simply to discourage car travel. Transport infrastructure is needed. Provision should be made for the needs of those who are not able to walk or cycle. Mere Way is intended as a major cycle route between Waterbeach New Town and the city. Putting the sewage works on Sites 1 or 2 will either sever it or greatly reduce its value. Site 2 could also affect the CAM.

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

Definitely not. There should be more transparency about the true carbon cost of NEC by including the environmental cost of relocating the sewage works. There need to be absolute guarantees that developers will play their part in reducing carbon emissions. Surely NEC buildings will have the highest carbon footprint in the land after factoring in the colossal carbon cost of moving the sewage works, building all the extra pipes and tunnels and decommissioning work.

The associated sewage works relocation to Sites 1 and 2 also risks reducing options for cycle and public transport infrastructure.

We all want the NEC development to benefit everyone in Cambridge but if it can only be achieved by moving a large sewage works into the middle of thriving and developing communities this is far from desirable or equitable, and a wider planning disaster could result.

Mrs Diane Plowman

